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CITY OF LA QUINTA
PLANNING & DEVELOPMENT DEPT.

FINAL ENVIRONMENTAL IMPACT REPORT
SPECIFIC PLAN 90-017
STATE CLEARINGHOUSE NO. 90020727

PLANNING DEPARTMENT

FILE COPY

PLANNING DEPARTMENT CERTIFICATION

I HEREBY CERTIFY THAT THIS FINAL EIR IS AN ACCURATE, OBJECTIVE AND ADEQUATE STATEMENT WHICH CONTAINS THE DOCUMENTATION REQUIRED TO IMPLEMENT CEQA, AND HAS OTHERWISE COMPLIED WITH CEQA.

RECOMMENDED
APPROVED
LA QUINTA PLANNING COMMISSION
BY [Signature]
DATE 9-10-91

[Signature]
Jerry Heyman
Planning Director
City of La Quinta

APPROVED BY CITY COUNCIL
ON 12-3-91

[Signature]
Douglas Wood
Douglas Wood & Associates
Environmental Consultant

COMMENTS/RESPONSES

The following agencies or individuals commented on the Supplemental Draft EIR. Please note that the Responses to Comments contain a summary of the comment received followed by the appropriate response. Following these responses are copies of the actual comments received. Included as attachments to this Response to Comments package is data from Endo Engineering related to various comments received on the Draft EIR.

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**SPECIFIC PLAN 90-017
FINAL ENVIRONMENTAL IMPACT REPORT
RESPONSES TO EIR COMMENTS**

A. RESPONSES TO COMMENTS FROM THE CITY OF LA QUINTA

GENERAL COMMENTS

Comment 1 (Population and Housing): The Draft EIR uses City-wide housing and employment statistics in its discussion of jobs/housing balance. It discusses employment of project residents. This section should be expanded to discuss employees of the proposed project (particularly related to golf course operations and maintenance, landscape maintenance, etc.) who will not be residing on-site. The EIR should also identify any measure to mitigate these impacts of these employees who reside off-site.

Response: The proposed golf course is expected to generate a total of approximately 20 employees.

It can be anticipated that a large majority of these employees will reside outside the project site but likely within the vicinity of the subject property. Figure 27 of the City of La Quinta, General Plan, Housing Element (Low and Moderate Income Housing Candidate sites) indicates possible locations of future low and moderate income housing in the City. These areas range from being adjacent to four miles from the subject property. Assuming an average distance of two miles from the project site to low and moderate income housing and a maximum total of 20 employees, a maximum of 80 vehicle miles is generated. This total is included as part of the total vehicle miles travelled utilized in traffic, noise and air quality analyses contained within the Draft EIR.

Potential mitigation of these employee-generated impacts is discussed within the City of La Quinta, General Plan, Housing Element. The Housing Element identifies State Housing Element requirements, an assessment of housing needs, and an inventory of housing resources and constraints. Among these requirements is "assisting in the development of adequate housing to meet the needs of low and moderate income households".

The Housing Element identifies (pages 40-68) those "constraints" upon the City which prevent the provision of housing for all income levels including low and moderate income housing. These constraints include previously-enacted land use controls, building code requirements, etc. Other non-governmental constraints include construction costs, financing costs, mortgage rates, land costs, community attitudes and other constraints.

The Housing Element concludes (pages 83-101) with an identification of specific programs to implement the Housing Element. These programs include a) allowing

"densities in certain new developments to be higher" (page 86); b) "allow the minimum lot size in certain new developments offering affordable units to be smaller (and simpler) and permit other costs saving measures" (page 86); c) provide incentives which may be applied to the creation of additional affordable housing (subsidizing land costs, fees and assessments, on- and off-site improvements, etc.) (page 95). These incentives would be funded by the Neighborhood Redevelopment Agency (pages 91-92); and d) encouraging Medium-High and High Density Housing along the Highway 111 Corridor to be accessible to employment, service, and transit opportunities (page 93). The Housing Element also indicates that "Special consideration will be given to new projects creating affordable units for purchase through factory-built or mobilehomes by means of higher densities or smaller units and special requirements, especially in the sphere of influence area one-half mile east of Jefferson, north of Avenue 54, and one-quarter mile east of Madison, south of Avenue 54" (page 97).

It remains with the City of La Quinta to implement these Housing Element recommendations within the context of the approvals of this proposed project. Any requirements or conditions placed upon the proposed project should be applied on a City-wide basis under the authority of programs enacted by the City Council.

Additional mitigation measures which could also be considered as a means of reducing these impacts include: Provision of commuter rideshare and transit incentives for employees in proposed recreational areas on-site; incorporation of project design features which facilitate public transit usage and containing public transit, ridesharing, local public works and other appropriate service organizations during early planning stages to insure that needed transit facilities are available when needed.

Comment 2 (Circulation): Clarification is necessary as to the basis for traffic generation rates assumed for the proposed single family "attached" (i.e. multi-family) residential land uses. In addition, clarification of the projects assumed within cumulative traffic impact assessments should also be provided.

Response: The "multi-family" category as defined in the Institute of Traffic Engineers (ITE) 4th Edition, "Trip Generation" is included in Land Use 230 as "Residential Condominium". The category is defined as follows:

"Residential condominiums are defined as single-family ownership units that have at least one other single-family owned unit within the same building structure. Both condominiums and townhouses are included in this land use."

Based upon this definition, 85% of housing proposed for this project is considered attached residential units which fall within Land Use 230, the "multi-family" category. The trip generation for the remaining 15% of housing proposed for the project was developed from the regression equations for Land Use 210, "Single-Family Detached

Housing". The golf course trip generation for the project was taken from Land Use 430.

The traffic study for this project included the PGA West Hotel originally addressed in the LSA "Oak Tree West" traffic study which included a trip generation rate of 10.5 trips per room based upon the ITE 3rd Edition "Trip Generation". For consistency with that study, the modification to the trip generation for PGA West utilized the same trip generation rates.

Comment 3 (Circulation): The list of related development projects used in the determination of cumulative impacts must be referenced as being taken from the 1985 Oak Tree West Traffic Study.

Response: As stated on page 3-15 of the Traffic Study (included in Appendix D of the Draft EIR),

"...the cumulative traffic impact assessment herein adds project-related traffic to cumulative projections developed in the Oak Tree West Traffic Study (LSA, April 1985)."

After listing the 15 cumulative projects addressed in the LSA study, the traffic study continues.

"Traffic volumes associated with additional cumulative developments were extended through the study area and added to the revised cumulative projections from the Oak Tree West Traffic Study"

Table 3-7 "Unadjusted Trip Generation Forecast" within the Traffic includes the new cumulative projects not addressed by the LSA study, and Table 3-8 addresses the modifications to the cumulative projects included in the LSA study.

Comment 4 (Traffic Analysis): Tables 3-7 and 3-8 of Technical Appendix D (Traffic Study) should be revised to reflect the most recent list of development proposals to be used as the basis for cumulative impact assessments.

Response: Development of the cumulative projects list was initially based upon the Residential and Commercial Development Status Reports provided by the City of La Quinta subsequent to a telephone conversation with Mr. Jerry Herman. Significant changes in land use have occurred to the cumulative projects addressed in the LSA traffic study, including elimination of some developments, renaming some developments, additional approved projects, and modifications to some of the approved projects.

After a thorough examination of the cumulative projects, the Traffic Engineer compiled a definitive list in a four-page letter dated June 7, 1990, addressed to Mr.

Jerry Herman. This letter represented their best effort to decipher the changes in the cumulative projects list.

The "Screencheck" response letter from the City of La Quinta (dated January 28, 1991) included requests to revise the cumulative projects list. The revisions made at that time included three projects from the June status reports, four projects which were already included, and four projects which we determined were located along Washington Street. After a lengthy conversation with Mr. Stephen Speers of the City of La Quinta who coordinated with Mr. Jerry Herman, the Traffic Engineer was instructed that our cumulative analysis did not require revision.

SPECIFIC PLAN 90-017 COMMENTS

Comment 5: The percentage of City residents who are employed should be updated.

Response: Page III-62, Paragraph 1 should be revised to indicate that 69% of the total population (according to 1980 census figures) are employed. Of the total of 2,864 residences within the City of La Quinta in 1980, approximately 9.64 percent (or 297 dwelling units) were vacant. By 1988, the total number of dwelling units in the City increased to 4,486 units. Of this latter total, approximately 30.85 percent (or 1,384 dwelling units) were vacant. This demonstrates the growth in the second home market in La Quinta. (The source of these figures is the City of La Quinta, General Plan, Housing Element, page 33).

Comment 6: The rationale for rejection of the Existing General Plan Alternative should be expanded in terms of how marketing factors may outweigh the environmental benefits of this Alternative.

Response: On page IV-13 of the Draft EIR, it is recognized that the Existing General Plan Alternative decreases traffic, noise, air quality impacts and utility and service requirements. However, ultimate development of 300 dwelling units on the project site (or 34.1% of the number of dwelling units as currently proposed) would likely jeopardize the ultimate marketing (i.e. sale of) dwelling units. As such, this alternative is not considered feasible from a marketing standpoint. Without such assurances, development of the property may not occur.

PLANNING COMMISSION COMMENTS

The following comments were generated by a discussion held at the May 28, 1991 public meeting of the City of La Quinta, Planning Commission.

Comment 7: The use of reclaimed and/or another tertiary water source for golf course irrigation should be discussed in the EIR.

Response: In response to comments received from Coachella Valley Water District on Specific Plan 90-016, the applicant has indicated that a mix of well water and irrigation water from the All American Canal will be used on the proposed golf course. Little in the way of disruption in the delivery of water supplies to downstream users is anticipated. Prior to grading plan approval, or recordation of the first tract map, a Downstream Uses Delivery Program which assures the continued, uninterrupted use of canal water shall be submitted to and approved by the CVWD. In addition, the applicant has agreed to design irrigation facilities on-site to utilize reclaimed water when such water becomes available.

Comment 8: A potential water conservation measure would be the construction of "reduced-turf" golf courses. The feasibility of this approach should be discussed.

Response: A "reduced-turf" (or target-style) golf course is not considered feasible for the proposed project in that the project site does not contain any unique or unusual topographic, geologic or vegetative features that lend themselves to that approach. Generally, such features are a necessary element to the provision of fairway interruptions and the creation of smaller "landing areas". Relatively flat, sandy gaps in fairways would detract from the aesthetic or functional aspects of the proposed golf course and would also be a source of fugitive dust.

Comment 9: The EIR should examine the impacts due to the loss of agricultural land as a result of project development.

Response: As indicated in Section III.G., Land Use in the Draft EIR, the project site has grown alfalfa within the past five years. However, none of the site is currently under cultivation. In addition, 160 acres of the site is currently under application for Agricultural Preserve cancellation. While development of the site could facilitate or hasten the conversion of surrounding agricultural lands, any off-site development would be subject to review and approval by the City of La Quinta.

Comment 10: Mitigation of traffic and air feasibility impacts should include preparation of a circulation plan addressing accommodation of non-automotive (golf carts, bicycles, pedestrian, etc.) modes of transportation. Access to proposed commercial areas should also be addressed within this plan.

Response: Prior to approval of grading plans or recordation of the first tract map, the applicant shall prepare a Non-Vehicular Circulation Plan which addresses in detail the methods for accommodating in a safe and efficient manner the use of golf carts, bicycles, pedestrians, etc. throughout the project site.

Comment 11: The proposed project's impacts upon existing equestrian uses in the vicinity should be addressed in the EIR.

Response: The project site does not contain any existing or designated equestrian trails. As such, development of the property as proposed would not

directly impede the continued utilization of existing trails or associated equestrian uses in the area. Little in the way of problems related to odors, traffic conflicts, etc. are anticipated.

B. RESPONSES TO COMMENTS FROM THE COACHELLA VALLEY UNIFIED SCHOOL DISTRICT

Comment 1: The proposed project will be served by Westside School (grades K-8) and Coachella Valley High School (grades 9-12) both of which are experiencing "substantial student overcrowding". Westside School is approximately 24% over capacity and Coachella Valley High School is 27% over capacity (as of May 17, 1991).

Response: As indicated on page III-96 of the Draft EIR, "both schools are currently operating above permanent building capacity. In the past year, 1 portable classroom has been utilized by the Westside Elementary School and 9 portable classrooms utilized by the High School. For the current school year (90-91) Westside is scheduled to utilize 4 portable classrooms and the High School is scheduled to utilize 13 portable classrooms".

Comment 2: The District utilizes an overall student generation factor of 2.969 students per household. This was determined based upon the total number of students in District divided by the number of existing residences. Resulting facilities costs and required additional construction are calculated based upon this factor as applied to Specific Plans 90-015, 90-016 and 90-017.

Response: On October 26, 1990, the Coachella Valley Unified School District provided the following student generation factors which provided the basis for impact assessments contained in the Draft EIR.

Grades K-6	1.0	student per dwelling unit
Grades 7-8	.4	students per dwelling unit
Grades 9-12	.6	students per dwelling unit
Total	2.0	students per dwelling unit

When applied to the 880 dwelling units proposed by the project, a total estimated student generation of 1,760 student results. When applying the higher factor noted above, a total student generation of 2,613 results. However, as noted on page III-96 of the Draft EIR, the proposed project is designed for and aimed at an older, semi-retired homebuyer. According to Landmark Land Company, several similar residential/recreational development projects offer a more realistic assessment of the actual number of students which would be generated by the proposed project. By way of example, the PGA West project generates a total of 14 students from 1,150 occupied dwelling units (.012 students per dwelling unit). The Mission Hills project generates 4 students from 1,095 dwelling units (.0036 students per dwelling unit). The Santa Rosa Cove project generates 20 students from 459 occupied dwelling units (0.43 students per dwelling unit). Using the highest of these factors, a total of 38 students would be generated by Specific Plan 90-017.

The Draft EIR goes on to state, "as the school district is currently overcrowded the proposed project will be required to cooperate with the District to ensure adequate accommodations for future students actually generated by the proposed project".

Comment 3: The District recommends a mitigation measure that the applicant provide the infrastructure and property for the construction of schools. This can be arranged through an Agreement between the School District and the applicant. The formation of a Mello-Roos District would assist in the financing of construction of new schools in the area. Developer fees of \$1.58 per square foot of residential development are insufficient for the funding of such construction.

Response: Page III-97 of the Draft EIR provides the following mitigation measure:

1. Impacts shall be mitigated in accordance with the provisions of AB1600, Section 53080 and 65995 of the Government Code or the then existing legislation and/or local ordinances adopted pursuant thereto or any applicable Mitigation Agreement entered into by the developer and the District.

As further indicated in the Draft EIR Summary, "construction of additional school facilities with required developer financial participation will be provided by the involved School District(s). However, the project applicant will be required to secure a Certificate from the affected School District(s) prior to securing building permits".

3. **RESPONSES TO COMMENTS FROM THE COUNTY OF RIVERSIDE,
DEPARTMENT OF HEALTH**

Comment: The Environmental Health Services Division of the County Health Department is concerned that reclaimed water is not anticipated for use.

Response: An additional mitigation measure has been added to Section III.M.1, Public Facilities and Services, Water and Sewer and the EIR Summary-Mitigation Monitoring Program which states: "Provisions shall be made in the design of the irrigation facilities to use reclaimed water, when it becomes available" (see Response to Comment 8 within A. Responses to Comments From the City of La Quinta as contained in this Response to Comments package).

**D. RESPONSES TO COMMENTS FROM THE COUNTY OF RIVERSIDE
TRANSPORTATION DEPARTMENT**

Comment 1: Traffic studies for the project should reflect cumulative traffic volumes associated with all three Specific Plans proposed by the project applicant (Specific Plans 90-015, 90-016 and 90-017) in combination with the Rancho La Quinta Specific Plan and the proposed Thermal Airport runway expansion.

Response: The cumulative projects list for all three specific plans were developed through coordination with the City of La Quinta, and verified in a letter to Mr. Jerry Herman dated June 7, 1990. This list was the basis for assessments of cumulative traffic impacts and was developed from the LSA study for the Oak Tree West traffic study. The Thermal Airport Expansion was not included, but would tend to reduce the traffic assigned to the most congested roadways north of the project sites. There is available existing and future capacity on the east-west roadways in the vicinity of the project sites. The increased assignment to these roadways based upon the Thermal Airport Expansion would be minor, and should not represent a capacity constraint.

Comment 2: The potential circulation impacts particularly of Specific Plan 90-017 upon Avenue 60 should be discussed as well as required mitigation measures.

Response: According to the Traffic Engineer, the attraction for project-related traffic south of the project site would appear to be non-existent except for the Rancho La Quinta project. The trip generation from the Rancho La Quinta project was included in the cumulative project traffic volumes. Based upon the traffic assignment, the impact of the proposed projects on Avenue 60 was considered insignificant. This roadway link was not included on the study area figure included in the coordination letter with Mr. Jerry Herman.

Comments 3 and 4: The intersections of Avenue 52 and Jefferson Street and Country Club Drive and Jefferson Street are currently controlled by four way stop signs.

Response: Figure 18, Existing Traffic Circulation as contained in the Draft EIR should be amended to reflect four way stop sign controls at the intersections of Avenue 52 and Jefferson Street and Country Club Drive and Jefferson Street.

E. RESPONSES TO COMMENTS FROM THE RIVERSIDE COUNTY SHERIFF

Comment 1: The Sheriff's Department utilizes a factor of 4.0 persons per dwelling unit. The Department's calculations of demand for law enforcement services are based on three bedrooms as a standard for single and multi-family dwelling units.

Response: The Draft EIR for Specific Plan 90-017 utilized the City of La Quinta's generation factor of 2.92 persons per dwelling unit to calculate population totals. The Draft EIR indicates an additional 3.9 officers are necessary to serve the proposed project. Using the population factor currently recommended by the Sheriff's Department results in an estimated need for 5.28 additional patrol officers to serve the proposed project.

Comment 2: The following additional mitigation measures are proposed for mitigation into the final project design.

- A. Address numbers should be mounted on contrasting background and should be of sufficient size to be legible from the roadway. They should be located near the roof lines on the corners of the homes and at the entrances of all business complexes.
- B. Offices (including temporary sales offices), homes, security fences and parking areas should be well-lit to provide a safe environment for residents, employees, etc.
- C. Deadbolt locking systems should be installed on all exterior doors. Hardened steel bolts using three-inch set screws should be used. Exterior doors not equipped with windows should contain peep holes to allow good visibility to the outside without having to open the door.
- D. Shrubbery and bushes should be trimmed low to the ground to allow better visibility from the street and to eliminate possible hiding places. Windows and doors should not be concealed by vegetation.

Response: These mitigation measures are hereby added to Section III.M.3, Public Facilities and Services, Police Protection and the EIR Summary-Mitigation Monitoring Program.

F. RESPONSES FROM THE RIVERSIDE COUNTY FIRE DEPARTMENT

Comment 1: The level of service required for this project should conform to the Category II - Urban criteria as outlined in the Fire Protection Master Plan.

Response: As indicated in Section III.M.2, Public Facilities and Services, Fire Protection of the Draft EIR: "The project has been designed in accordance with criteria for Category II-Urban as outlined in the Fire Protection Master Plan with a fire station located within three miles and receipt of full "first alarm" response within 15 minutes".

Comment 2: A fiscal source should be identified to mitigate potential costs to the Fire Department in terms of both capital and annual operation costs.

Response: As further indicated in Section III.M.2 of the Draft EIR: "The project sponsor shall contribute to funding on a fair-share basis for any necessary facilities or operations for fire protection services based upon an established City-wide program".

G. RESPONSES TO COMMENTS FROM WASTE MANAGEMENT OF THE DESERT, INC.

Comment 1: As this Company is the refuse hauler for the area, they are interested in the curbside recycling measure proposed in Section III.M.7, Public Facilities and Services, Solid Waste.

Response: Curbside recycling is recommended in the Draft EIR in order to reduce the quantities of solid waste in response to AB 1462 which requires reduction of the overall waste stream by 20% and AB 939 which requires a 25% reduction by 1995 and a 50% reduction by the year 2000.

Comment 2: This Company is currently involved in a composting program with a composting plant located in the City of Mecca.

Response: Given the significant amount of "green waste" associated with the proposed golf course operations, composting is considered to be a potential method of significantly reducing the amount of such solid waste. As indicated in Section III.M.7 of the Draft EIR, "composting facilities shall be integrated into the final project design". Such facilities may be centralized off-site.

H. RESPONSES TO COMMENTS FROM SUNLINE TRANSIT

Comment: Sunline Transit recognizes the future need for transit service being extended to the project area to serve future residents as well as project-related employees. They cannot justify extension of fixed route transit service to either Jefferson or Madison Avenues at this time, however, future demand may necessitate extension of transit service to these roadways in the future. A means for funding transit amenities is currently being sought.

Response: These comments are hereby incorporated into the Final EIR. As indicated in Section III.L, Circulation of the Draft EIR, "In order to encourage transit usage, transit stop shelters shall be constructed at locations which busses are expected to stop in the event that transit service is extended to the site".

**I. RESPONSES TO COMMENTS FROM THE STATE OF CALIFORNIA,
DEPARTMENT OF CONSERVATION**

Comment 1: The potential for soil settlement and other geologic issues on the project site appears to be appropriately addressed by the proposed mitigation measures (as contained in Section III.A, Seismic Safety of the Draft EIR).

Response: These comments are hereby incorporated into the Final EIR.

Comment 2: Appendix B identifies liquefaction on-site as a potential hazard. This is not reflected in the text of the Draft EIR.

Response: As stated in Appendix B of the Draft EIR, "Although some of the site soils are considered liquefiable, the presence of silt layers should limit the effects to an overall areal subsidence. The potential problems associated with the possible subsidence should be minimized by constructing any proposed structures on a compacted soil mat of uniform thickness. A minimum pad thickness of four (4) feet should minimize the differential settlement of the structures themselves. As a minimum consideration, a unitized foundation and slab system should be used. Other mitigating measures such as additional slab and footing reinforcement should also be considered". These measures are proposed as mitigations within Section III.A. Seismic Safety and Section III.B. Soils and Erosion of the Draft EIR.

**J. RESPONSES TO COMMENTS FROM THE STATE OF CALIFORNIA,
DEPARTMENT OF WATER RESOURCES**

Comment: This correspondence provides a detailed list of measures intended to encourage water conservation and prevent flood damage.

Response: These comments are noted and hereby incorporated into the Final EIR. Section III.M.1, Public Facilities and Services, Water and Sewer provides additional mitigation measures intended to minimize the consumption of potable and irrigation water.

K. RESPONSES TO COMMENTS FROM THE STATE OF CALIFORNIA, INTEGRATED WASTE MANAGEMENT BOARD

Comment 1: In order to fully identify project impacts, the final disposal site for the project's solid waste generation should be identified.

Response: As indicated in Section III.M.7, Public Facilities and Services, Solid Waste, the project will be served by the Coachella Landfill, located at 87-011 4th Street in Coachella which is operated by the County Waste Management District.

Comment 2: The anticipated types and quantities of solid wastes to be generated upon implementation of the plan should be discussed. The generation of construction waste and additional sewage sludge generated, which would require landfilling, should be discussed.

Response: Upon project completion, the proposed project is anticipated to generate typical solid waste associated with residential and commercial development as well as "green waste" associated with golf course facilities. This "green waste" (grass clippings, etc.) is used for mulching and fertilizing on-site rather than being disposed of off-site. The project will adhere to City and County requirements relative to the storage and handling of solid waste generated by the project during construction. The Coachella Valley Water District disposes of sludge generated by treatment of sewage at the Mid Valley Water Reclamation Plant. According to the Water District, the precise amount of sludge associated with this specific project cannot be accurately quantified. Sludge is disposed of through composting and landfill disposal. Their previously-expressed ability to handle sewage generated by the proposed project includes handling and disposal of the incremental increase in sludge generation as a result of project development.

Comment 3: The impacts of solid waste generated by the proposed project on remaining landfill capacities should be identified.

Response: The Coachella Landfill is currently receiving 665 tons of refuse per day or 242,725 tons per year (assuming the landfill receives waste 7 days a week) and has an anticipated lifespan of 27 years which calculates to a remaining acceptance capacity of 6,553,575 tons. Specific Plan 90-017 is anticipated to generate 16 tons of waste per day or 5,840 tons per year which calculates to the utilization of 2.5% per year of remaining acceptance capacity. Specific Plan 90-016 is anticipated to generate an additional 8,395 tons per year of solid waste while Specific Plan 90-015 is anticipated to generate 7,300 tons per year. These related projects comprise an additional 6.4% per year of remaining acceptance capacity. This estimate of anticipated lifespan of the Coachella Landfill is based upon current solid waste totals being received at that site. This estimate does not account for additional residential growth in the service area nor does it assume any offsetting decrease due to implementation of AB 1462, which requires a 20% reduction in overall solid waste and AB 939 which mandates a 25% reduction by 1995 and a 50% reduction by the year 2000.

Comment 4: Any unauthorized or unpermitted landfilling or dumping at the project site should be identified.

Response: No past or present areas of unpermitted landfilling or dumping are known to exist on the Specific Plan 90-017 site.

Comment 5: The California Integrated Waste Management Board suggests the following measures to be considered in the Final EIR:

- A. Implementation of a curbside recycling program in the residential development areas.
- B. Provide information to residents about the recycling services in the development area(s). Identify buy back centers and possible markets for recyclables in the area(s). Suggest to residents and businesses that they recycle glass, metal, paper, cardboard, and other materials to the maximum extent feasible.
- C. Promote the use of insulation and other products made of recycled materials in the construction of development structures.
- D. Promote the inclusion of recycle storage areas into the design of the residential units.
- E. Suggest to residents and businesses that they utilize products made from recycled materials to the maximum extent possible.
- F. Develop a composting program at the golf course to recycle grass clippings and green wastes on the development's landscapes.

Response: Mitigation measures for Specific Plan 90-016 relative to solid waste states the following:

The County Solid Waste Management Plan includes programs to reduce the quantities of waste being sent to landfills. These programs include source reduction, separation of recoverables, composting, and high technology resource recovery. The County encourages the general public, schools and businesses to learn and utilize information regarding recycling and the use of recycled materials. Implementation of these programs can aid in the reduction of the increase in solid waste generation associated with new development, which in turn will aid in extension of the life span of affected disposal sites.

The County is currently required to address AB1462 which requires implementation of plans to reduce the overall waste stream by 20%. As previously mentioned, Assembly Bill 939 requires landfill waste streams to be reduced by 25% by 1995 and 50% by the year 2000. The County

encourages large projects and other municipalities to implement methods for inclusion of separate and enlarged trash enclosures to store recycled materials (glass, newspaper, aluminum, etc.) particularly within multi-family and commercial projects. In addition, the following specific mitigations are contained in Section III.M.7, Public Facilities and Services, Solid Waste of the Draft EIR.

1. The proposed refuse hauler to the project site shall be advised of the efforts the developer will be pursuing relating to recycling and waste reduction (i.e. curbside recycling, buy back centers, etc.).
2. Given the significant amount of green waste associated with golf course operations, proper on-site storage and re-use or recyclable material is recommended. Such storage/composting facilities shall be integrated into the final project design.

The developer shall also participate in any established City-wide program to reduce solid waste generation. The elements of this program could include:

- a. Developing and distributing brochures on residential and commercial recycling, residential and commercial source reduction, waste management issues, the importance of using recycled goods, and litter control.
- b. Development of curriculum guides and kits in cooperation with the City and the Coachella Valley Unified School District.
- c. Production of video programs which can be shown on local cable television stations in the La Quinta area.
- d. Pursue an environmental labelling program at local grocery stores, liquor stores, etc. which would educate consumers in recycling of packaging and other consumer goods.
- e. Pursue a recycled products awareness campaign which would commend business which use recycled products. This program could issue stickers to businesses that use recycled products to display in their windows.
- f. Develop a library of media production on recycling and source reduction which can be borrowed by various citizen groups, agencies, and schools within the City.

L. RESPONSES TO COMMENTS FROM THE SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

GENERAL COMMENTS

Comment 1: The SCAQMD suggests that a single EIR for all three Specific Plans proposed by the Applicant (i.e. Specific Plans 90-015, 90-016 and 90-017) be prepared. They describe the advantages of the Program EIR approach.

Response: The City of La Quinta, as Lead Agency, determined that separate EIR's for the three projects noted above be prepared. This determination was felt to conform with the intent of the State CEQA Guidelines. Each EIR contains assessments of cumulative impacts which includes the other two proposals as well as other proposed and approved developments in the area.

The table below provides the cumulative air pollutant emission burden associated with build-out of all three Specific Plans. If the three projects had been addressed in one EIR, this table would have been added to the cumulative impact discussion (pages III-20 and III-21).

Cumulative Project-Related Air Pollutant Emissions
(Year 1995)

<u>Primary Pollutant</u>	<u>SP 90-015 (Lbs./Day)</u>	<u>SP 90-016 (Lbs./Day)</u>	<u>SP-90-017 (Lbs./Day)</u>	<u>Total (Lbs./Day)</u>
CO	649.6	1,598.6	555.6	2,803.8
ROG	71.6	175.0	60.3	306.9
NO _x	166.2	374.4	141.3	681.9
Particulates	32.3	79.3	27.7	139.3

COMMENTS THAT APPLY TO SPECIFIC PLAN 90-017

Comment 2: Air Quality data from 1989 and 1990 for Palm Springs and Indio should be incorporated into the Final EIR.

Response: The latest copy of the air quality study (February, 1991) included air quality data for 1987 through 1989. The 1990 data, which became available for the first time in June of 1991 is hereby included to revised pages III-13 and III-14 of the Draft EIR to read as follows:

"Air quality trends which have developed at the Palm Springs and Indio air quality monitoring stations between 1988 and 1990 are discussed below. From the ambient air quality data (included in the Appendix), it

can be seen that only ozone and particulates have exceeded the relevant state and federal standards.

The state sulfate standard ($\geq 25 \text{ u/m}^3$ -24 hour standard) has not been exceeded in this basin and there are no federal sulfate standards. The maximum sulfate concentration monitored in 1989 was 12.1 u/m^3 at the Palm Springs station and 18.3 u/m^3 at the Indio station. Sulfur dioxide is not monitored in SRA 30 and therefore is not considered a significant local pollutant.

Lead monitoring in SRA 30 was terminated during 1987 and then resumed in 1989. Lead has not exceeded federal or state standards statewide since 1982.

Carbon monoxide (CO) and nitrogen dioxide (NO_2) are monitored at the Palm Springs station. Over the past three years, there have been no basin wide exceedances of CO or NO_2 . If these pollutants become a concern to the SCAQMD or the California Air Resources Board (CARB) in the future, ambient air quality data will be collected for them.

Ozone equalled or exceeded the state 1 hour standard (0.09 ppm) on 26 percent of the days monitored in Palm Springs and on 17 percent of the days monitored in Indio (1989 and 1990 data only). The federal standard ($>.12 \text{ ppm}$) was exceeded on 9 percent of the days at Palm Springs and 4 percent of the days in Indio.

Over the past three years, only one first stage ozone episode (1-hour average $>.20 \text{ ppm}$) was declared at the Palm Springs station. That occurred in 1988. No second stage (1-hour average $>.35 \text{ ppm}$) or third stage (1-hour average $>.50 \text{ ppm}$) ozone episodes were called. The maximum 1-hour concentration measured was 20 parts per hundred million (pphm) in 1988.

Of all the pollutants monitored, PM_{10} equalled or exceeded the California ambient air quality standard most often. Suspended particulate matter with an aerodynamic diameter equal to or less than 10 microns (PM_{10}) exceeded the California 24-hour standard of 50 micrograms per cubic meter on 57 percent of the occasions monitored at the Indio station and on 19 percent of the observations at the Palm Springs station.

The maximum 24-hour PM_{10} concentration monitored at the Indio station in 1989 was $712 \text{ ug/cubic meter}$ (14 times the state standard). This reading was taken on one of four "exceptional meteorological event" days in 1989 and may have actually reached $3000 \text{ ug/cubic meter}^2$. The federal 24-hour PM_{10} standard was exceeded on 4 percent of the observations at the Indio station and 1 percent of the observations at the Palm Springs station during the three year time period analyzed".

Comment 3: To determine the significance of construction-related air quality impacts, the thresholds within the SCAQMD handbook should be utilized.

Response: The table below provides the project-related daily construction activity and operational emissions for comparison to the SCAQMD significance thresholds. It should be added to the Draft EIR on page III-18. As shown below, the project will exceed the significance thresholds for NO_x and particulates on a short-term basis and will exceed the significance thresholds for CO, ROG (reactive organic gases), and NO_x on a long term basis (see Attachment A to this Response to Comments package for further details regarding assumptions used for these calculations).

SP 90-017 Project-Related Air Pollutant Emissions
(Year 1995)

<u>Primary Pollutant</u>	<u>Short-Term (Lbs./Day)</u>	<u>Long-Term (Lbs./Day)</u>	<u>Threshold (Lbs./Day)</u>
CO	63	1,598.6	550
ROG	11	175.0	75
NO _x	154	374.4	100
SO _x	16	0.0	150
Particulates	238	79.3	150

Comment 4: The significance of PM₁₀ emissions during construction should be determined by comparing them to the 150 Lbs./Day SCAQMD threshold of significance for particulates. Short-term impacts are not necessarily insignificant just because they are temporary.

Response: The table below provides the daily exhaust emissions from the construction crew and the construction equipment for Specific Plan 90-017. It also includes an estimate of the exhaust emissions that will occur over the entire construction period for this project. This table should be added to the Draft EIR on page III-18. Details regarding assumptions and calculations made to determine the construction crew exhaust emissions shown in the table below are included as Attachment A to this Response to Comments package.

SP 90-017 Construction Period Exhaust Emissions¹

<u>Primary Pollutant</u>	<u>Significance Threshold (Lbs./Day)³</u>	<u>Daily Emissions (Lbs./Day)</u>	<u>Emissions Over Entire Construction Period (Lbs.)</u>
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Construction Equipment

CO	550	56	16,520
ROG	75	10	2,950
NO _x	100	153	45,135
SO _x	150	16	4,720
Particulates	150	11	3,245

Construction Crew²

CO	550	7	2,152
ROG	75	1	172
NO _x	100	1	399
SO _x	150	0	0
Particulates	150	Negl.	Negl.

¹ See Attachment A for emission factors by vehicle type, assumptions and calculations. Approximately 50% of the daily total suspended particulate exhaust emissions are are PM₁₀.

² Emission factors for 1992 were assumed for a "worst case" analysis.

³ The significance threshold value shown for particulates is currently being interpreted as PM₁₀ by the SCAQMD.

PM₁₀ emissions during construction can be estimated by adding the fugitive dust emissions during grading to the portion of the particulate exhaust emissions that are PM₁₀ (assuming 50% of the daily total suspended particulate emissions shown are PM₁₀). PM₁₀ emissions are approximately 30 to 50 percent of the total particulate matter generated by the project. Estimates of project-related dust generation within the Draft EIR are based upon the assumption of 16 acres being graded at one time rather than 100 acres of grading as discussed by SCAQMD. These differing assumptions explain the disparities between the respective calculations of particulate generation. By way of correction, it should be noted that the particulate generation estimate by SCAQMD should be 24,200 pounds per month (using their assumptions) rather than pounds per day.

PM₁₀ emissions during construction (239 lbs./day) will exceed the 150 pound/day significance threshold. Consequently, based upon a "worst case" scenario, short-term

PM₁₀ emissions will be significant during construction. As indicated in the Draft EIR, the project proponent will adhere to SCAQMD Rule 403 to reduce fugitive dust emissions.

Comment 5: For each construction phase, estimates of emissions should be performed. A work plan may be included as a mitigation measure to ensure daily emissions from construction activities do not exceed the SCAQMD threshold levels.

Response: At this planning stage, emissions by construction phase cannot be estimated in a manner that would be accurate or relevant, due to the unknown nature of building types and construction materials. Phased construction plans are not currently available.

Comment 6: Emissions related to recreational areas and landscaping should be estimated. These estimates should indicate whether parking structures will be underground or above ground.

Response: Parking structures are not included in the project design. Emissions related to implementing recreational areas and landscaping are similar to those associated with implementing the other land uses proposed on-site and are included in the fugitive dust and construction exhaust emission projections developed to represent implementation of the project.

Comment 7: Emissions associated with hauling soil to and from the site during remedial work should be estimated and include mitigation measures as noted. Hazardous contaminants should be tested prior to remedial work. If found, compliance with SCAQMD rules prior to excavation and dewatering will be required. Remediation activities may require separate environmental analyses.

Response: Cut and fill will be balanced on-site, therefore, no soil will be hauled to or from the site. Remedial work will not start before results are received for tests to determine the presence of hazardous contaminants in the water well and petroleum stained soils. If found, the remedial work will be done in compliance with all applicable SCAQMD rules. Phase I, Preliminary Environmental Site Assessment was performed on the site, the results of which are discussed in Section III.B., Soils and Erosion of the Draft EIR.

Comment 8: Demolition requires sampling and testing for asbestos in advance and additional mitigation if found beyond that listed in Rule 1403.

Response: There is no demolition of existing buildings required for implementation of this Specific Plan.

Comment 9: The Draft EIR should follow the recommended PM₁₀ control measures found in the PM₁₀ SIP for the Coachella Valley.

Response: As noted in the Draft EIR, the project proponent will adhere to SCAQMD Rule 403 to reduce fugitive dust emissions. In addition, all applicable conditions of approval regarding dust control will be strictly adhered to by the project.

Comment 10: Emissions from coating and paving materials associated with this development should be estimated.

Response: The following discussions of construction equipment exhaust emissions should be included in the Final EIR.

Architectural and Paving Materials Emissions

Emissions will occur as a result of coating and paving materials used on-site during the construction process. At this level of planning, it is impossible to accurately estimate specific levels of coating and paving materials to be used on-site. At the time of building permit issuance and construction, the contractor overseeing the construction activities will comply with SCAQMD Rule 1403 and adopted state laws.

The primary pollutants of concern from asphalt paving operations are volatile organic compounds (VOC). The major source of these is the evaporation of the petroleum distillate solvent (or diluent) used to liquify the cutback asphalt cement. This occurs at the plant (during mixing and stockpiling) and at the job site (where VOCs are released from the equipment used to apply the asphaltic product and from the road or other paved surface).

Long term emissions of VOCs are a function of the volume of diluent added to the cutback and the density of the diluents and asphalt cement used in the cutback asphalt. Based upon typical diluent content values for medium cure cutback asphalt of 35% by volume (and a typical density assumed for the diluent of 0.8 kg/liter) 20% by weight of the cutback asphalt will ultimately evaporate and be emitted as VOCs, according to EPA documentation.

According to SCAQMD, for medium cure cutback asphalt, 320 pounds of VOCs per ton of asphalt are emitted. Approximately 20% of the diluent is emitted during the first day after application. About 50% is emitted during the first week, and 70% of the diluent has evaporated after 4 months. Since no control devices are available to reduce evaporative emissions from cutback asphalts, asphalt emulsions are typically used instead of cutback asphalts to eliminate VOC emissions.

The volatile organic compound content of architectural materials (paint, varnish, lacquer, primer, etc.) that will be used on-site for decorative and protective purposes will not be known until specific products are selected. Moreover, the amount of surface coating materials that will be needed on-site during surface coating operations will not be determined until the project is approved and detailed plans with architectural treatments and surface elevations are developed.

About 50% of the volatile thinners and solvents used to facilitate the application of the surface coatings will evaporate during the surface coating application and drying process. VOCs released by paint total approximately 1,120 pounds per ton of paint applied. Varnish and shellac VOC emissions total 1,000 pounds per ton of coating applied. VOC emissions associated with the application of lacquer include 1,540 pounds per ton applied. Enamel has the lowest VOC emission rate (80 pounds per ton of coating applied). According to EPA documents, compounds released during the application of primer (zinc chromate) total 1,320 pounds per ton applied. Consequently, to minimize VOC emissions during surface coating operations, enamels should be used as much as possible and the use of lacquers should be minimized.

Comment 11: EMFAC 7EP emission factors should be used for estimates of emissions from future projects.

Response: Composite running emission factors based on EMFAC 7EP were unavailable when the air quality report was prepared. Therefore, the EMFAC 7C factors provided in the "Air Quality Handbook", (SCAQMD 1987) were utilized.

Comment 12: The source of electrical energy for construction related activities should be provided along with mitigation measures to reduce these emissions.

Response: Gasoline-powered portable generators provide temporary power during construction until the Imperial Irrigation District can provide power. Although an estimate of the electrical consumption is not available, power from the grid will be used whenever possible to minimize emissions from portable generators (which are less efficient).

Comment 13: Compare long term emissions with the threshold limits in the "EIR Handbook".

Response: See Response to Comment #3 above.

Comment 14: Emissions associated with the transport of solid waste and sludge to landfills should be included.

Response: Solid waste removal is provided by an independent contractor. Diesel powered vehicles are typically used and the average trip length is approximately 20 miles. Without the number of truck loads to be hauled, it is not possible to accurately predict the air pollutant emissions.

Comment 15: The type of golf cars and whether they operate on electricity.

Response: A total of 90 electric golf carts will be used for each 18 holes of golf.

Comment 16: The proposed TDM plan should include strategies to achieve a 1.5 average vehicle ridership (AVR) for 2-way commute trips.

Response: No TDM program is proposed at this time.

Comment 17: Compliance with AB 3205 should be assured if the project is within a 0.25 mile radius of an existing school site.

Response: At this time, no proposed or existing school sites are within a 0.25 mile radius of the project site.

Comment 18: Future residents could be exposed to toxic air contaminants and blowsand by adjacent farming activities.

Response: Adjacent farming activities are privately owned and operated. Information regarding pesticides used is not publicly available. All dwellings in the desert are typically air-conditioned. This could reduce but not eliminate the potential for adverse impacts in this regard.

Comment 19: Cumulative emissions including SP 90-015, 90-016 and 90-017 should be compared to the district threshold criteria.

Response: As discussed in Response to Comment #1 above, it appears that all of the thresholds will be exceeded by SP 90-015, 90-016 and 90-017 except the SO_x threshold (139.3 lbs/day versus 150 lbs/day). Therefore, the project will have a cumulative adverse long term impact on air quality. Regional transportation and parking management strategies should be considered by the City to reduce VMT and increase AVR.

Comment 20: All applicable mitigation measures should be incorporated to reduce or eliminate construction-related air quality impacts.

Response: Attachment B to this Response to Comments package includes a list of site specific mitigation measures derived from the generalized list provided by the SCAQMD. These measures will be incorporated in the project as conditions of approval.

Comment 21: Mitigation monitoring procedures and/or techniques should be discussed to ensure that these measures can feasibly be implemented.

Response: The following should be added to the Draft EIR. "Mitigation monitoring procedures will comply with AB 3180. Construction contractors will comply with SCAQMD and City requirements in affect at the time of grading permit issuance. Included within these requirements is adherence to SCAQMD Rule 1403 regarding sampling and testing for asbestos for any buildings to be demolished."

As stated in the DEIR Summary - Mitigation Monitoring Program Section D, "Implementing actions that ensure that mitigation measures can feasibly be implemented occur during grading plan approval, pursuant to the requirements of the City of La Quinta, Public Works Department. Adherence to transportation-related

recommendations will occur through approval and implementation of project plans with the City of La Quinta, Planning and Development Department".

Attachment A

Construction-Related Emissions

La Quinta Specific Plans 90-015, 90-016 and 90-017 Fugitive Dust Emissions

Proposed Projects	Acreage	Grading Period		Acres Disturbed Per Month	TSP (Tons/Mo)	Total TSP Over Construction Period		
		(Weeks)	(Months)			(No Control) (Tons)	(With Water Control) (Tons)	(Lbs/Day)
SP 015	265	71	16	16	19.5	318	159	900
SP 016	327	87	20	16	19.5	392	196	900
SP 017	220	59	14	16	19.5	264	132	900

Land Use Alternatives	Acreage	Grading Period		Acres Disturbed Per Month	PM10 (Tons/Mo)	Total PM10 Over Construction Period		
		(Weeks)	(Months)			(No Control) (Tons)	(With Water Control) (Tons)	(Lbs/Day)
SP 015	265	71	16	16	5	82	41	232
SP 016	327	87	20	16	5	101	51	233
SP 017	220	59	14	16	5	68	34	233

- NOTES:
1. Phone communication with Mr. Dwayne Bockman of Yeager Construction on 4/8/91, indicating that to grade 30 acres in this area would require an 8 week grading period (or 40 working days).
 2. TSP emission factor is from EPA "Compilation of Air Pollution Emission Factors", AP-42, Vol. II, September 1985.
 3. PM10 emission factor is from SCAQMD "Draft AQMP 1991 Revision", Technical Report III F, Page 90, December 1990.

La Quinta Specific Plan 90-015, 90-016 and 90-017

Equipment Category	Number of Vehicles	Pollutant Emission Rate (Pounds/Hour)				
		CO	HC	NOx	SOx	Particulates
Tractor						
- Track-Type	0	0.346	0.121	1.260	0.137	0.112
- Wheeled	0	3.590	0.188	1.269	0.090	0.136
Wheeled Dozer	2	1.794	0.192	4.166	0.348	0.165
Scraper	3	1.257	0.282	3.840	0.463	0.406
Motor Grader	2	0.151	0.040	0.713	0.086	0.061
Loader						
- Track-type	0	0.201	0.098	0.827	0.076	0.058
- Wheeled	2	0.572	0.250	1.890	0.182	0.172
Off-Highway Truck	2	1.794	0.192	4.166	0.454	0.256
Roller	1	0.304	0.067	0.862	0.067	0.050
Miscellaneous	0	0.675	0.152	1.691	0.143	0.139
Total No. of Equipment	12					
		Pollutant Emission Forecast (Pounds/Day)				
Daily Op. Hr/Day		CO	HC	NOx	SOx	Particulates
Tractor						
- Track-Type	0	0	0	0	0	0
- Wheeled	0	0	0	0	0	0
Wheeled Dozer	4.5	16	2	37	3	1
Scraper	4.5	17	4	52	6	5
Motor Grader	4.5	1	0	6	1	1
Loader						
- Track-type	0	0	0	0	0	0
- Wheeled	4.5	5	2	17	2	2
Off-Highway Truck	4.5	16	2	37	4	2
Roller	4.5	1	0	4	0	0
Miscellaneous	0	0	0	0	0	0
Total Emissions (Lbs/Day)		56	10	153	16	11
		Construction Equipment Emissions Over Construction Period (Lbs)				
Weeks		CO	HC	NOx	SOx	Particulates
SP 90-015	71	19,880	3,550	54,315	5,680	3,905
SP 90-016	87	24,360	4,350	66,555	6,960	4,785
SP 90-017	59	16,520	2,950	45,135	4,720	3,245
		Construction Crew Vehicular Emissions (Lbs/Day)				
Weeks		CO	HC	NOx	SOx	Particulates
Personnel Vehicles	12					
1992 VEF (G/Mile)		6.900	0.550	1.280	0.000	0.297
Construction Crew Vehicular Emissions Over Construction Period						
Crew Veh. Emiss. (Lbs/Day)		7	1	1	0	0
SP 90-015	71	2,590	206	480	0	0
SP 90-016	87	3,173	253	589	0	0
SP 90-017	59	2,152	172	399	0	0
		Total Emissions Over Construction Period (Lbs)				
Weeks		CO	HC	NOx	SOx	Particulates
SP 90-015	71	22,470	3,756	54,795	5,680	3,905
SP 90-016	87	27,533	4,603	67,144	6,960	4,785
SP 90-017	59	18,672	3,122	45,534	4,720	3,245

Attachment B

Mitigation Measures

5.3 Air Quality Mitigation Measures

Project-related emissions will exceed the SCAQMD threshold criteria as a direct and/or indirect result of project construction and the long-term use of the land uses proposed. In addition, cumulative impacts will be significant.

While some mitigation measures are incorporated in the project design, other measures appear to be feasible and should be considered as conditions of approval to ensure that air quality impacts are minimized. While it is not likely that the impacts will be mitigated to a level of insignificance, the following measures can reduce the impacts and should be implemented if feasible.

Incorporated Recommendations

The following mitigation measures are recommended for inclusion in the project's Mitigation Monitoring Program.

To Minimize Construction Activity Emissions:

1. SCAQMD Rule 403 will be adhered to, insuring the clean up of construction-related dirt on approach routes to the site. (AQMP Control Measure 12a Paved Roads [PM])
2. Adequate watering techniques will be employed to partially mitigate the impact of construction-generated dust particulates. The water should be reclaimed or agricultural canal type, whenever available. Portions of the project site that are undergoing earth moving operations should be watered such that a crust will be formed on the ground surface and then watered again at the end of the day. (AQMP Control Measure F-4 Control of Fugitive Dust Emissions from Construction of Roads and Buildings [PM] and PM10 SIP Control Measure 5a [PM].)
3. Any vegetative ground cover to be utilized on-site will be planted as soon as possible to reduce the amount of open space subject to wind erosion. Irrigation systems needed to water these plants should be installed as soon as possible to maintain the ground cover and minimize wind erosion of the soil. (PM10 SIP Control Measure 5g [PM].)
4. Construction access roads will be paved as soon as possible and cleaned after each work day. The maximum vehicle speed limit on unpaved roads should be 15 mph. (PM10 SIP Control Measure 4d and 3d [PM].)
5. Grading operations will be suspended during first and second stage smog alerts or when winds exceed 30 mph. (PM10 SIP Control Measure 5c and 1d [PM].)
6. Operations such as grading activities, which tend to create fugitive dust, should be suspended when wind gusts exceed 20 mph or if wind driven sand movement is visible."
7. Any construction equipment using diesel drive internal combustion engines will use a diesel fuel with a maximum of 0.05% sulfur and a four degree retard.
8. All trucks should maintain at least two feet of freeboard (PM10 SIP Control Measure 5d [PM].)

9. Trucks hauling dirt, sand, soil or other loose dirt material, off-site, will be covered. (PM10 SIP Control Measure 5c [PM].)
10. Mitigation monitoring procedures will comply with AB 3180. Construction contractors will comply with SCAQMD and City requirements in effect at the time of grading permit issuance.

To Reduce Construction-Related Traffic Congestion:

11. Construction personnel will be informed of ridesharing and transit opportunities.
12. Construction parking will be configured to minimize traffic interference.
13. A flag person will be used to guide traffic properly and to ensure safety at construction sites.
14. Construction operations affecting off-site roadways will be scheduled for off-peak traffic hours and will minimize obstruction of through-traffic lanes. (AQMP Control Measure 3.a. Truck Dispatching, Rescheduling and Reporting [ROG, NOx, PM]).

To Reduce Long Term Operational Emissions:

15. Golf Course Employers of 100 or more persons at a single worksite will comply with SCAQMD Regulation XV, Trip Reduction/Indirect Source. In an effort to increase the average vehicle ridership (AVR), employers will consider ridesharing programs, transit incentives, modified work schedules, and parking fees/incentives.
16. Building construction will comply with the energy use guidelines in Title 24 of the California Administrative Code.

Recommendations for Further Consideration

The following measures are recommended for implementation, where feasible.

1. The preferential use of diesel-powered construction equipment rather than gasoline-powered equipment, to affect exhaust emission reductions and evaporative and crankcase HC emission reductions.
2. Construction equipment should be properly maintained and serviced to minimize exhaust emissions.
3. Low emission building materials such as preprimed and sanded, wood moulding and trim products and preprimed wallboard, should be considered for construction materials wherever feasible. Also, vacuuming in lieu of pneumatic debris removal. (AQMP Control Measure F-9 Low Emission Methods and Materials for Building Construction [ROG])
4. The use of energy efficient street lighting (low pressure sodium vapor lights) should be considered on-site to reduce emissions at the power plant serving the site.
5. The design of green belt areas can maximize the shading effect of landscaping for streets, parking areas and building walls. This shading effect could result in reduced air conditioning demand for electrical energy.

6. Consideration should be given to the use of solar water heaters and solar pool heaters. (AQMP Control Measure D-4 Control of Emissions from Swimming Pool Water Heating [NOx] and D-5 Control of Emissions from Residential and Commercial Water Heating [NOx]).
7. Although the use of chemical stabilizers within 100 feet of unpaved roads on-site would provide additional dust control, the cost effectiveness of this procedure in this case is not clear.

COMMENTS RECEIVED FROM CIRCULATION
OF DRAFT EIR



City of La Quinta

78-105 CALLE ESTADO - LA QUINTA, CALIFORNIA 92253 - (619) 564-2246

June 7, 1991

Mr. Doug Wood
Douglas Wood & Associates
567 San Nicolas Drive
Suite 301
Newport Beach, CA 92660

SUBJECT: STAFF COMMENTS ON DRAFT EIR'S FOR
SPECIFIC PLANS 90-015, 90-016 & 90-017

Dear Mr. Wood:

This letter represents our comments regarding the above subject which must be responded to as part of the Final EIR's for these projects. Please note that Landmark Land Company has requested that Specific Plan 90-016 be the initial project heard before Planning Commission on June 25, 1991; therefore, you should concentrate on preparation of the Final EIR for this proposal so that it can be included with the Planning Commission materials. This would have to be provided to us no later than June 20, 1991, to allow the Planning Commission adequate time to review the responses.

Please also be aware that the deadline for EIR comments was extended to two agencies; South Coast Air Quality Management District was extended to June 17, 1991; SCAG requested an extension to June 14, 1991. These will be forwarded to you by facsimile transmittal if and when they are received.

As we had discussed by phone and as indicated in the Staff memo to the Planning Commission dated May 28, 1991, which was provided to you, this letter consists of both Staff concerns/comments and those offered by the Planning Commission at their May 28, 1991 meeting.

The following comments generally apply to all three Specific Plan EIR's:

SECTION H: Population and Housing

1. Staff reiterates its concerns as presented in our 1st and 2nd screencheck comments. It is not viewed as appropriate to suggest a "worst case" employment count based on an overall city-wide housing unit-to-employed population which is a derived census data estimate. 1
- a. This methodology does not indicate whether vacant housing units were excluded.
- b. The general approach appears to be geared towards employment of the residents of the project itself. We understand that the project will generate little in the way of a labor force. Our concern is the impact on jobs/housing balance for workers who will fill the employment needs brought on by this project due to the Citrus Course expansion, golf course maintenance, additional common area maintenance, landscaping requirements, etc. This section does not appear to address this. There should be some data on jobs generated by this project provided in the EIR.
- c. We feel that the mitigation measures should focus primarily on addressing housing availability and employment generation impacts of this project with regards to vehicle miles traveled by on-site employees. In other words, what is proposed to mitigate the perceived imbalance of on-site employment which may be generated by this project and available housing opportunities for those potential employees (i.e. ridership programs by large scale landscape firms, etc.). It is clear that maintenance and service employees for this project will not be able to live on-site; there needs to be some discussion of mitigating the impacts due to that alternative not being available.

SECTION L: Circulation

1. Please respond to our previous concerns;
 - a. Clarify what the ITE Trip Generation rates were based upon for single family uses given in Table 17; i.e the text refers to single family attached as "multi-family". We feel that some rationale for multi-family trip assignments to a described single family use needs to be given. Also, identify the source for all trip generation rates used and what ITE tables these numbers were derived from. 2
2. The list of 15 development projects needs to be referenced as coming from the 1985 LSA Oak Tree West traffic study, if it is to be used. Use of the list here is unclear as to its relationship to the previous list given in Table 12. The purpose of including this list needs to be identified in the text, as many of these projects have changed substantially or no longer exist. 3

APPENDIX D - Traffic Analysis

1. Tables 3-7 & 3-8 have not been revised in accordance with our screen check letters, nor has the list of 15 projects from the Oak Tree West Traffic study (page 3-15 , 3-16) been updated. Please respond as to why this has not been done. 4

SPECIFIC PLAN 90-015

1. Page III-61 - First paragraph indicates that 46% of City residents are employed, based on 1980 Census data. This figure should be 69%. Also note whether total housing count excludes unoccupied units and note the source for that number.
2. Page IV-12 - The Table on this page indicates that the existing General Plan for Residential 3B is 2-5 units per acre; the actual range for this category is .2-.4 units per acre. Please revise this section (all numbers and text) accordingly. Also, the total acreage figure should read 265 acres.
3. See also general comments in this letter which apply to this EIR as well as 90-016 and 90-017.

SPECIFIC PLAN 90-016

1. Please note that City of La Quinta land use designations became effective on January 30, 1991; this should be reflected on Figure 4, p. II-6 (also note that pages II-5 and II-6 are reversed). The current General Plan Amendment is only necessary for relocating the commercial land use designation to the northwest corner of Jefferson Street and 52nd Avenue.
2. Figure 6, page II-11 should read R-1 zoning instead of R-1-10.
3. Page III-65 - Same comments as for Item 1 under Specific Plan 90-015 apply to this EIR.
4. Page IV-13 - The current La Quinta General Plan Land Use Designations are Special Commercial and Low Density Residential (2-4 units per acre). The discussion in the first paragraph of this page should be expanded based upon the 2-4 units per acre density range, as it is incorrectly identified as 0-2 units per acre.
5. See also the general comments in this letter which apply to this EIR as well as 90-015 and 90-017.

SPECIFIC PLAN 90-017

1. Page III-62 - Same comment as for Item 1 under Specific Plan 90-015 applies with regards to total housing and population employed. 5
2. Page IV-13 - Expand the rationale behind rejection of the existing General Plan Alternative beyond marketing factors, or elaborate as to how/why these factors outweigh the environmental benefit of selecting this alternative. 6
3. See also general comments in this letter which apply to this EIR as well as 90-015 and 90-016.

PLANNING COMMISSION COMMENTS

On May 28, 1991, the La Quinta Planning Commission held a public meeting to discuss their concerns regarding these three proposals and conveyed them to staff.

1. There should be some discussion of the feasibility of using reclaimed water for golf course irrigation and the potential for future use of a tertiary water source during the life of the projects. 7
2. A potential water conservation measure could be construction of reduced turf golf courses. This should be addressed in the EIR's and it's feasibility discussed. 8
3. The EIR's need to look more closely at the impacts due to agricultural land loss from the development of these proposals. 9
4. Mitigation for traffic/air quality should include that the applicant prepare a circulation plan for accommodating non-automotive means of transportation, including bicycle, golf cart, pedestrian and other modes on-site to reduce vehicle trips, congestion and auto emissions. For Specific Plan 90-016, there should be same provision for access via these modes to the commercial area from the residential area. 10
5. A discussion needs to be included relative to the project's impacts to equestrian uses in the vicinity, as well as the impacts of equestrian properties on the projects. Factors such as availability of public equestrian trails, odors, traffic conflicts, and equestrian boarding operations, etc., should be look at in this discussion. 11

Please be aware that the following hearing dates apply to these proposals:

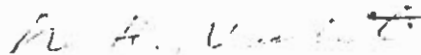
ITEM	PC	CC
Specific Plan 90-016	6/25/91 (5 PM)	7/16/91 (7PM)
Specific Plan 90-015	7/ 9/91 (7 PM)	9/ 3/91 (7PM)
Specific Plan 90-017	7/23/91 (7 PM)	9/ 3/91 (7PM)

These meetings may necessitate continuances; you will receive hearing notices prior to each meeting. A representative from each of the parties involved with preparation of the EIR's should be present at all scheduled and continued Hearings to address any Planning Commission and City Council concerns/questions.

If you have any questions, please contact the undersigned.

Very truly yours,

JERRY HERMAN
PLANNING & DEVELOPMENT DIRECTOR



Wallace H. Nesbit
Associate Planner

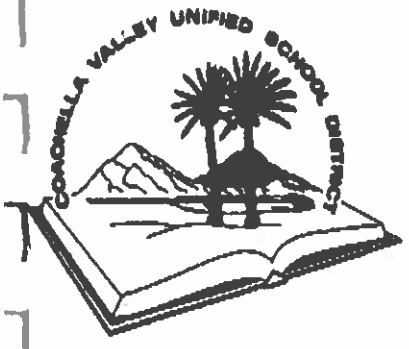
WHN:ccs

Attachment: PC Agenda

cc: Forrest Haag; Landmark Land Company
Alex Londos; Landmark Land Company
Greg Endo; Endo Engineering
Steve Speer; Senior Civil Engineer
SP Files

COACHELLA VALLEY UNIFIED SCHOOL DISTRICT.

POST OFFICE BOX 847 THERMAL, CALIFORNIA 92274 (619) 399-5137



RECEIVED

MAY 20 1991

CITY OF LA QUINTA
PLANNING & DEVELOPMENT DEPT.

May 17, 1991

Mr. Wallace Nesbit, Associate Planner
Planning Department
City of La Quinta
78-105 Calle Estado
La Quinta, CA 92253

RE: Specific Plan 90-015, 90-016 and 90-017

Dear Mr. Nesbit:

We have completed our review of the Environmental Impact Reports for the following Specific Plans:

<u>Project Title</u>	<u>Total Number of Residential Units</u>
Specific Plan No. 90-016 (The Grove)	1,200
Specific Plan No. 90-017 (PGA 5th)	880
Specific Plan No. 90-015 (Foster Turf)	1,060

The three Specific Plan Projects will generate 3,148 dwelling units. These projects will significantly impact the School District.

Westside School (Grades K-8) and Coachella Valley High School (Grades 9-12) will serve the proposed housing projects. Substantial student overcrowding exists at Westside and Coachella Valley High Schools. Below shows, per school site, the current student enrollment, the permanent building capacity, and the percentage of over facility capacity.

1

<u>Permit Building Capacity</u>	<u>Current Enrollment</u>	<u>% Over Facility Capacity</u>
Westside - 709	936	24%
CVHS - 1,650	2,095	27%

Westside School is 24% and Coachella Valley High School is 27% over facility capacity.

The School District's overall student generation factor is 2.969. This figure was determined by dividing the total number of students by the total number of existing residential units. Based on the student generation factor and projected number of housing units to be developed, the proposed project will generate 9,346 students into our School District. The accumulated facility cost to house these additional students is \$100,300,401.00. 2

Our future plans involve the construction of an Elementary School and a Junior High School near the project sites. However, there are no adequate funds available to construct these schools.

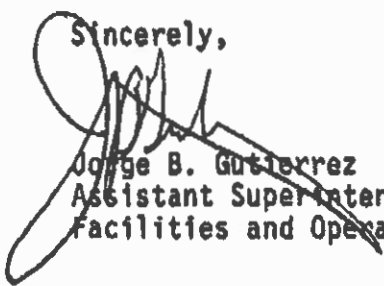
Currently, the School District levies a developer fee at \$1.58 per square foot for all residential construction as a mitigation measure to help resolve the school housing problem. However, we anticipate that there will be an insufficient amount of revenue generated from Developer Fees to adequately fund the construction of new schools. The School District cannot rely on Developer Fees or the State School Construction Program to resolve the student housing problem related to these developments.

As a mitigation measure, we recommend the Developer provides the infrastructure and the property for the construction of schools. This will be arranged through an Agreement between the School District and the Developer. Also, a recommended mitigation measure to sufficiently finance the construction of new schools is the formation of a Mello Roos District within the project area. 3

In regards to short term impact, we anticipate that the new students generated due to the project would be housed in portable classrooms at Westside and Coachella Valley High Schools until the new school facilities are built.

At this time, we do not have any other comments. We would be interested in meeting with representatives from the development firms and the City of La Quinta to discuss our concerns and mitigation measures to address the student housing problem. Please contact me at (619) 399-5137, Ext. 235.

Sincerely,

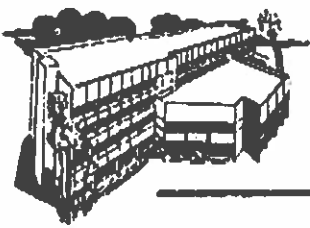


Jorge B. Gutierrez
Assistant Superintendent
Facilities and Operations

JBG/ee

c: Al Mijares, Superintendent, CVUSD

Cert. Mail No. P 815 142 699



COUNTY OF RIVERSIDE DEPARTMENT OF HEALTH

E.J. GALLAGHER, M.D., M.P.H., M.A.
DIRECTOR OF HEALTH

C

Phone: (619) 775-2000

4065 COUNTY CIRCLE DR. RIVERSIDE, CA. 92503
(Mailing Address—P.O. Box 7600 Riverside, CA. 92513-7600)
FAX (714) 358-4529

RECEIVED

MAY 21 1991

CITY OF LA QUINTA
PLANNING & DEVELOPMENT DEPT.

May 13, 1991

To: City of La Quinta
P.O. Box 1504
La Quinta, CA. 92253

From: Riverside County Department of Health
Environmental Health Services Division
79733 Country Club Drive, Suite D
Bermuda Dunes, CA. 92201

Subject: Specific Plan Nos. 90-015, 90-016, 90-017

The Environmental Health Services Division (EHSD) of the Health Department has reviewed the draft Environmental Impact Reports for the above Specific Plans and has the following recommendations:

The EHSD is concerned that reclaimed waste water is not anticipated to be used for any of these three Specific Plans. The EHSD strongly urges that this position be reconsidered and that reclaimed waste water be used wherever feasible for these projects.

1

If you have any questions, please call Don Park at (619) 775-2000.

Thank You.

Don Park
Assistant Public Health Engineer

MR/DP:vm

ONDRA ROWELL, B.S.N., M.S.A.
DEPUTY DIRECTOR OF HEALTH
PERSONAL HEALTH SERVICES

JOHN FANNING, R.E.H.S., M.P.A.
DEPUTY DIRECTOR OF HEALTH
ENVIRONMENTAL HEALTH SERVICES

R.L. NEX, M.S., M.P.H.
ASST. DIRECTOR OF HEALTH

H.C. HOLK, D.V.M., M.P.H.
DEPUTY DIRECTOR OF HEALTH
SPECIAL SERVICES

E.B. COYNE, M.S.
DEPUTY DIRECTOR OF HEALTH
SUPPORT SERVICES

HEALTH CENTERS

DANFORD 3055 RAMSEY STREET - Danford, CA 92520 • BLYTHE 803 NORTH BROADWAY - Blythe, CA 92225 • SABA BLANCA 7240 MARGUERITA - Riverside, CA 92504 • GORNA 305 SOUTH BUENA VISTA - Corona, CA 91720 • HEWET 800 NORTH STATE STREET - Hemet, CA 92343 • INDIO 46-209 OASIS STREET - Indio, CA 92201 • LAKE ELSDORE 30198 FRASER DR. - Lake Elsdore, CA 92520
PALM SPRINGS 3111 TANQUITZ-McDALLUM - Palm Springs, CA 92264 • PERRIS 237 NORTH "D" ST. - Perris, CA 92570 • RIVERSIDE 1880 LINDEN ST. - Riverside, CA 92507 • JUPITA 8418 MISSION BLVD. - Riverside, CA 92508 • TEMECULA 41022 COUNTY CENTER DRIVE - Temecula, CA 92590

D



FRANKLIN R. SHERKOW
Director of Transportation

COUNTY OF RIVERSIDE

TRANSPORTATION DEPARTMENT

PLANNING AND DEVELOPMENT REVIEW DIVISION

May 9, 1991

RECEIVED

MAY 20 1991

Mr. Wallace H. Nesbit
City of La Quinta
P.O. Box 1504
La Quinta, CA 92253

CITY OF LA QUINTA
PLANNING & DEVELOPMENT DEPT

RE: Notice of Completion for
Specific Plan No. 90-016
(The Grove) and Specific
Plan No. 90-017 (PGA 5th
Course)

Dear Mr. Nesbit:

The County of Riverside Transportation Department has reviewed the above referenced documents and has the following comments:

- * In our letter dated July 25, 1990, one of our concerns and recommendation was that traffic studies considering the impacts of nearby proposals be conducted for all three projects, especially SP No. 90-017, as it is in combination with the Rancho La Quinta Specific Plan and the Thermal Airport runway expansion. There is no discussion regarding the Rancho La Quinta Specific Plan, nor the Thermal Airport runway expansion, as indicated on Page III-83 (SP No. 90-017) and Page III-85 (SP No. 90-016), which references the cumulative impact assessments of area development.

Our concern is that the proposed development in the area will increase local traffic, with much of the impact on roads remaining under County jurisdiction. Therefore, the Transportation Department recommends that the Rancho La Quinta Specific Plan and the Thermal Airport runway expansion be included in the traffic study to assess potential impacts to local roads, as well as County maintained roads.

- * Specific Plan No. 90-017 is located one mile north of Avenue 60, a County maintained road designated as a Secondary (88' R/W) between Madison and Monroe, and an Arterial (100' R/W) east of Monroe, extending beyond Thermal Airport. The draft EIR's do not discuss potential impacts to Avenue 60, especially impacts from Specific Plan 90-017. Mitigation measures, if any, should be discussed in the draft EIR's.

2



* Specific Plan No. 90-017, Page III-75, indicates that the intersection of Avenue 52 and Jefferson Street is controlled by a four-way stop sign. The Existing Traffic Circulation Exhibit (Fig. 18) does not show a four-way stop sign at this location. This contradiction should be corrected.

3

* In the Circulation Analysis of Appendix D in SP No. 90-016, the document indicates that a four-way stop is located at the intersection of Country Club Drive and Jefferson Street. The Existing Circulation Exhibit (Fig. 3-1) does not show a four-way stop sign at this location. This contradiction should be corrected.

4

Thank you for the opportunity to review draft Specific Plans No. 90-016 and 90-017. If you should have any questions, please contact Frank Coyle, Associate Transportation Planner, at (714) 275-6829.

Best regards,

Martha Tarlton

Martha Tarlton
Senior Transportation Planner

MDT:FLC:jw

RIVERSIDE COUNTY

COIS BYRD, SHERIFF



Sheriff

82-695 DR. CARREON BLVD. • INDIO, CA 92201 • (619) 342-8990

May 9, 1991

RECEIVED

MAY 09 1991

CITY OF LA QUINTA
PLANNING & DEVELOPMENT DEPT.

Mr. Wallace Nesbit
City of La Quinta
Planning & Development Division
78105 Calle Estado
La Quinta CA 92253

Re: Specific Plan #90-017;
GPA #90-030; CZ #90-055

Dear Mr. Nesbit:

We have the following comments concerning the above proposed project.

Regarding Police Staffing - Increases in population result in an increase of called for services. The proposal reviewed centers on the projected construction of 880 single and multi-family residences at the northeast corner of Madison Street and 58th Avenue, and adjacent to the southern boundary of PGA West. This low density residential area will impact significantly on the Sheriff's Department's ability to provide police services. Based on three bedroom homes with four person occupancy, the project may increase population by a total of 3,520 residents, necessitating an increase of 5.28 patrol officers (the Sheriff's Department strives to achieve a ratio of 1.5 officers per 1,000 population). A systematic breakdown of the exact number of 2,3, and 4 bedroom family homes to be constructed was not provided. The projected population increase was calculated using three bedrooms as a standard for the single and multi-family homes. The projected population increase will also impact traffic conditions by increasing daily round trips in the area by an estimated 2,640 round trips daily.

1

Regarding Project Design - We recommend that address numbers be mounted on contrasting background. The numbers should be of sufficient size to be legible from the roadway and should be situated near the roofline on the corners of the residence. This will reduce the response time of emergency vehicles to the residences.

2

Streets, security walls and parking areas should be well lighted to provide a safer environment for the residents and to dissuade would-be criminals from targeting the area for illegal activities. High pressure sodium lights are recommended as they provide the greatest amount of light per kilowatt and are the least expensive to operate.

Page 2

Re: Specific Plan #90-017;
GPA #90-030; CZ #90-055

May 9, 1991


All residential doors should have an industrial quality key and latch system. Deadbolt locks are suggested for all exterior doors. The locks should be installed using three inch set screws to provide maximum benefit. All exterior doors, without windows, should have a peephole installed in order to allow good visibility of the outside area without having to open the doors. Windows should not be placed close enough to doors, which would allow a person to break the glass and unlock the door by hand.

Shrubbery and bushes should be trimmed low to the ground to eliminate hiding places for criminals and to allow better visibility from the street for patrolmen. Windows should never be concealed by vegetation.

The crime prevention measures outlined in this letter are merely suggestions and are not required as a prerequisite for plan approval. We appreciate the opportunity to comment on the project from a law enforcement point of view.

Sincerely,

COIS BYRD, SHERIFF


Robert Doyle, Captain
Indio Station Commander

CB:RD:gt

RIVERSIDE COUNTY FIRE DEPARTMENT



210 WEST SAN JACINTO AVENUE • PERRIS, CALIFORNIA 92370
(714) 657-3183

GLEN J. NEWMAN
FIRE CHIEF

April 30, 1991

RECEIVED

MAY 0 8 1991

**CITY OF LA QUINTA
PLANNING & DEVELOPMENT DEPT.**

TO: City of La Quinta
Planning Division
Attention: Wallace Nesbit

RE: Notice of Preparation
Draft EIR
SP #90-017

With respect to the scope and content of the environmental impact report for the above referenced project, the Fire Department has the following comments:

The level of service required for this project should be aligned with the criteria for Category II-Urban as outlined in the Fire Protection Master Plan and as follows:
(a) fire station located within three miles, (b) receipt of full "first alarm" assignment within 15 minutes. 1

Impacts to the Fire Department are generally due to the increased number of emergency and public service calls generated by additional buildings and human population. A fiscal analysis for this project should identify a funding source to mitigate any impacts associated with any capital costs and the annual operating costs necessary for an increased level of service. 2

All questions regarding the meaning of these comments should be referred to the Fire Department Planning & Engineering Staff at (619) 342-8886.

Sincerely,

RAY REGIS
Chief Fire Department Planner

By *Tom Hutchison*
Tom Hutchison
Fire Safety Specialist

te

PLANNING DIVISION

INDIO OFFICE
79-733 Country Club Drive, Suite F, Indio, CA 92201
(619) 342-8886 • FAX (619) 775-2072

RIVERSIDE OFFICE
3760 12th Street, Riverside, CA 92501
(714) 275-4777 • FAX (714) 369-7451

TEMECULA OFFICE
41002 County Center Drive, Suite 225, Temecula, CA 92390
(714) 694-5070 • FAX (714) 694-5076

Waste Management of the Desert, Inc.
41-575 Eclectic Street
P.O. Box 3878
Palm Desert, California 92261-3878
619/324-1741



A Waste Management Company

G

May 30, 1991

Wallace Nesbit
Associate Planner
CITY OF LA QUINTA
78-105 Calle Estado
La Quinta, CA 92253

RECEIVED
MAY 31 1991
CITY OF LA QUINTA
PLANNING & DEVELOPMENT DEPT.

Dear Mr. Nesbit:

After reviewing the EIR's for specific plans 90-015, 90-016 and 90-017 as it relates to solid waste we would offer the following comments:

- A) As stated in the mitigation measures section we will be very interested, as the proposed refuse hauler, in this curbside recycling plan. Given the nature of this project, certain issues need to be addressed. 1
- B) Waste Management of the Desert is currently running a joint venture project in the area of composting. Our composting plant, located in the City of Mecca, would be able to accept the green waste generated by this project. Proper on-site composting facilities at the proposed project would require certain permits to be attained by the Developer if our composting plant is not used. 2

If we can be of any further assistance with regards to solid waste or recycling issues, please do not hesitate to call.

Sincerely,

J. Alex Bralovich
Operations Manager

JAB/vlo

SunLine Transit

MEMBER AGENCIES

Cathedral City
 Coachella
 Desert Hot Springs
 Indian Wells
 Indio
 La Quinta
 Palm Desert
 Palm Springs
 Rancho Mirage
 Riverside County

RECEIVED

JUN 10 1991

CITY OF LA QUINTA
 PLANNING & DEVELOPMENT DEPT

June 6, 1991

Mr. Wallace Nesbit
 Associate Planner
 City of La Quinta
 78105 Calle Estado
 La Quinta, CA 92253

RE: Specific Plans 90-017, 90-016, 90-015

Dear Mr. Nesbit:

I have received the above referenced Specific Plans. These 3 plans have in common the fact that they are large developments centered on a public street; for two of the projects, the street is Madison, the other is Jefferson.

SunLine Transit recognizes that these types of developments do generate some need for transit services. When these projects are new, the initial demand is for employees. As the development matures and the population living within these projects ages the need for transit increases for the residents. Given the low level of demand for transit services in the initial years and given that the areas on either side of Jefferson and Madison appear to be developing in large, low density, gated communities, SunLine Transit Agency can not justify operating a fixed route service at this time. In the future, however, a transit route on Jefferson and on Madison may be needed.

I am seeking your assistance to identify possible means to condition the developers to set aside money to pay for future transit amenities which will be needed or in some other way insure that the funding for these transit needs will be available.

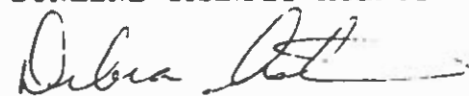
1

Would you and other members of your staff be available to discuss possible options? I would suggest meeting the week of June 17. Please give me a call to set up the exact date and time.

The comment period for the 3 projects listed in the RE, is June 7, 1991. I am uncertain as to how to ask that these projects be conditioned at this time. But I do feel strongly that a condition needs to be put on each of the developers. Please take whatever steps you feel is necessary to condition the developers given SunLine's concerns.

Please feel free to call me to discuss these comments. I look forward to your phone call to set up a date.

Yours Very Truly,
SUNLINE TRANSIT AGENCY


Debra Astin
Director of Planning

DA/dc

GOVERNOR'S OFFICE OF PLANNING AND RESEARCH

1400 TENTH STREET
SACRAMENTO, CA 95814

Jun 07, 1991

RECEIVED

JUN 10 1991

CITY OF LA QUINTA
PLANNING & DEVELOPMENT DEPT.WALLACE H. NESBIT
CITY OF LA QUINTA
P.O. BOX 1504
LA QUINTA, CA 92253Subject: SPECIFIC PLAN 90-017 (PGA 5TH COURSE)
SCH # 90020727

Dear WALLACE H. NESBIT:

The State Clearinghouse has submitted the above named draft Environmental Impact Report (EIR) to selected state agencies for review. The review period is now closed and the comments from the responding agency(ies) is(are) enclosed. On the enclosed Notice of Completion form you will note that the Clearinghouse has checked the agencies that have commented. Please review the Notice of Completion to ensure that your comment package is complete. If the comment package is not in order, please notify the State Clearinghouse immediately. Remember to refer to the project's eight-digit State Clearinghouse number so that we may respond promptly.

Please note that Section 21104 of the California Public Resources Code required that:

"a responsible agency or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency."

Commenting agencies are also required by this section to support their comments with specific documentation. These comments are forwarded for your use in preparing your final EIR. Should you need more information or clarification, we recommend that you contact the commenting agency(ies).

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact Russell Colliau at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

David C. Nunenkamp
Deputy Director, Permit Assistance

Enclosures

cc: Resources Agency

Memorandum

(1) Douglas P. Wheeler
Secretary for Resources

Date : May 23, 1991

(2) Wallace Nesbit
City of La Quinta
78-105 Calle Estado
La Quinta, CA 92253

Subject: Draft EIR for
Specific Plans
90-15, 90-16,
90-017 -
SCH# 90020731,
90020728 and
90020727

From : Department of Conservation—Office of the Director

The Department of Conservation's Division of Mines and Geology (DMG) has reviewed the Draft Environmental Impact Reports (Draft EIR's) for three proposed Specific Plans within the city of La Quinta. The most significant geologic issues affecting these Specific Plans are seismic ground shaking and hydroconsolidation. The identified potential secondary affects of seismic ground shaking include settlement and, in the case of Specific Plan 90-017, soil liquefaction. The Draft EIR's propose to mitigate these geologic hazards by constructing uniform compacted earth mats for all structures and, as a minimum, designing structures to the requirements of the Uniform Building Code for Seismic Zone 4. These mitigation measures appear to be appropriate for the proposed projects.

1

For Specific Plan 90-017, soil liquefaction is recognized as a potential hazard in the appended geotechnical report, yet the Draft EIR for this Specific Plan states that the liquefaction potential is low. We recommend that this discrepancy be corrected in the Final EIR.

2

If you have any questions concerning these comments, or would like additional information, please contact Roger Martin, Division of Mines and Geology Environmental Review Project Manager, at (916) 322-2562.

Dennis J. O'Bryant

Dennis J. O'Bryant
Environmental Program Coordinator

cc: Roger Martin, Division of Mines and Geology
Timothy McCrink, Division of Mines and Geology



Memorandum

Date : May 24, 1991

- 1. Project Coordinator
Resources Agency
- 2. City of La Quinta Planning Department
78-105 Calle Estado
La Quinta, California 92253
Attention: Wally Nesbit

From : Department of Water Resources
Glendale, California 91209-9068

Subject : DEIR for Specific Plan 90-017, PGA West 5th Course Expansion for
880 Units and Other Structures, SCH 90020727

Your subject document has been reviewed by our Department of Water Resources staff. Recommendations, as they relate to water conservation and flood damage prevention, are attached.

After reviewing your report, we also would like to recommend that you further consider implementing a comprehensive program to use reclaimed water for irrigation purposes in order to free fresh water supplies for beneficial uses requiring high quality water supplies.

1

For further information, you may wish to contact John Pariewski at (818) 543-4609.

Thank you for the opportunity to review and comment on this report.

Charles R. White, Chief
Planning Branch
Southern District

Attachments



Department of Water Resources Recommendations
for Water Conservation and Water Reclamation

To reduce water demand, implement the water conservation measures described here.

Required

The following State laws require water-efficient plumbing fixtures in structures:

- o Health and Safety Code Section 17921.3 requires low-flush toilets and urinals in virtually all buildings as follows:

"After January 1, 1983, all new buildings constructed in this state shall use water closets and associated flushometer valves, if any, which are water-conservation water closets as defined by American National Standards Institute Standard A112.19.2, and urinals and associated flushometer valves, if any, that use less than an average of 1-1/2 gallons per flush. Blowout water closets and associated flushometer valves are exempt from the requirements of this section."
- o Title 20, California Administrative Code Section 1604(f) (Appliance Efficiency Standards) establishes efficiency standards that give the maximum flow rate of all new showerheads, lavatory faucets, and sink faucets, as specified in the standard approved by the American National Standards Institute on November 16, 1979, and known as ANSI A112.18.1M-1979.
- o Title 20, California Administrative Code Section 1606(b) (Appliance Efficiency Standards) prohibits the sale of fixtures that do not comply with regulations. No new appliance may be sold or offered for sale in California that is not certified by its manufacturer to be in compliance with the provisions of the regulations establishing applicable efficiency standards.
- o Title 24 of the California Administrative Code Section 2-5307(b) (California Energy Conservation Standards for New Buildings) prohibits the installation of fixtures unless the manufacturer has certified to the CEC compliance with the flow rate standards.
- o Title 24, California Administrative Code Sections 2-5352(i) and (j) address pipe insulation requirements, which can reduce water used before hot water reaches equipment or fixtures. These requirements apply to steam and steam-condensate return piping and recirculating hot water piping in attics, garages, crawl spaces, or unheated spaces other than between floors or in interior walls. Insulation of water-heating systems is also required.

Health and Safety Code Section 4047 prohibits installation of residential water softening or conditioning appliances unless certain conditions are satisfied. Included is the requirement that, in most instances, the installation of the appliance must be accompanied by water conservation devices on fixtures using softened or conditioned water.

Government Code Section 7800 specifies that lavatories in all public facilities constructed after January 1, 1985, be equipped with self-closing faucets that limit flow of hot water.

Recommendations to be implemented where applicable

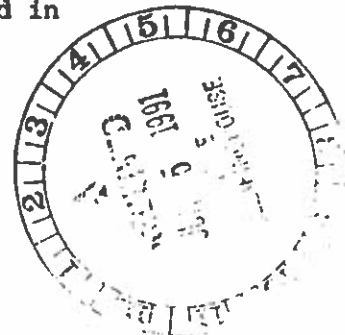
Interior:

1. Supply line pressure: Water pressure greater than 50 pounds per square inch (psi) be reduced to 50 psi or less by means of a pressure-reducing valve.
2. Drinking fountains: Drinking fountains be equipped with self-closing valves.
3. Hotel rooms: Conservation reminders be posted in rooms and restrooms.* Thermostatically controlled mixing valve be installed for bath/shower.
4. Laundry facilities: Water-conserving models of washers be used.
5. Restaurants: Water-conserving models of dishwashers be used or spray emitters that have been retrofitted for reduced flow. Drinking water be served upon request.*
6. Ultra-low-flush toilets: 1-1/2-gallon per flush toilets be installed in all new construction.

Exterior:*

1. Landscape with low water-using plants wherever feasible.
2. Minimize use of lawn by limiting it to lawn-dependent uses, such as playing fields. When lawn is used, require warm season grasses.
3. Group plants of similar water use to reduce overirrigation of low-water-using plants.
4. Provide information to occupants regarding benefits of low-water-using landscaping and sources of additional assistance.

*The Department of Water Resources or local water district may aid in developing these materials or providing other information.



5. Use mulch extensively in all landscaped areas. Mulch applied on top of soil will improve the water-holding capacity of the soil by reducing evaporation and soil compaction.
6. Preserve and protect existing trees and shrubs. Established plants are often adapted to low-water-using conditions and their use saves water needed to establish replacement vegetation.
7. Install efficient irrigation systems that minimize runoff and evaporation and maximize the water that will reach the plant roots. Drip irrigation, soil moisture sensors, and automatic irrigation systems are a few methods of increasing irrigation efficiency.
8. Use pervious paving material whenever feasible to reduce surface water runoff and to aid in ground water recharge.
9. Grade slopes so that runoff of surface water is minimized.
10. Investigate the feasibility of using reclaimed waste water, stored rainwater, or grey water for irrigation.
11. Encourage cluster development, which can reduce the amount of land being converted to urban use. This will reduce the amount of impervious paving created and thereby aid in ground water recharge.
12. Preserve existing natural drainage areas and encourage the incorporation of natural drainage systems in new developments. This aids ground water recharge.
13. To aid in ground water recharge, preserve flood plains and aquifer recharge areas as open space.

Department of Water Resources
Recommendations for
Flood Damage Prevention

In flood-prone areas, flood damage prevention measures required to protect a proposed development should be based on the following guidelines:

1. It is the State's policy to conserve water; any potential loss to ground water should be mitigated.
2. All building structures should be protected against a 100-year flood.
3. In those areas not covered by a Flood Insurance Rate Map or Flood Boundary and Floodway Map, issued by the Federal Emergency Management Agency, the 100-year flood elevation and boundary should be shown in the Environmental Impact Report.
4. At least one route of ingress and egress to the development should be available during a 100-year flood.
5. The slope and foundation designs for all structures should be based on detailed soils and engineering studies, especially for hillside developments.
6. Revegetation of disturbed or newly constructed slopes should be done as soon as possible (utilizing native or low-water-using plant material).
7. The potential damage to the proposed development by mudflow should be assessed and mitigated as required.
8. Grading should be limited to dry months to minimize problems associated with sediment transport during construction.

CALIFORNIA INTEGRATED WASTE MANAGEMENT BOARD

1020 Ninth Street, Suite 100
Sacramento, California 95814

State of California

Environmental Affairs Agency

Memorandum

To : Russ Colliau
State Clearinghouse
1400 Tenth Street
Sacramento, CA 95814

Date: May 3, 1991

Wallace Nesbit
City of La Quinta
78-105 Calle Estado
La Quinta, CA 92253

RECEIVED

MAY 09 1991

From : *John D. Smith*
John D. Smith, Manager
Local Planning Division
California Integrated Waste Management Board

CITY OF LA QUINTA
PLANNING & DEVELOPMENT DEPT

Subject: SCH #90020731, 90020728, 90020727 Draft Environmental Impact Report (DEIR) for the General Specific Plan 90-015 (Foster Turf Property), 90-016 (The Grove Property), 90-017 (PGA West 5th Course Expansion) La Quinta, San Bernardino County.

California Integrated Waste Management Board (CIWMB) staff have reviewed the DEIR for the document cited above and offer the following comments:

Specific Plan 90-015 proposes a residential and golf course community on 265 acres, 125 of which will be golf course use. 1060 dwelling units are proposed (overall 4.0 units per acre density overall, 7.6 acres net). The project as proposed is similar to the adjacent PGA West project to the west, and will "tie-in" with that project.

Specific Plan 90-016 proposes a residential golf course community and approximately 21 acres of general commercial uses. 1208 units are proposed on 306 acres (overall 3.95 UPA, 8.0 UPA net density). The commercial square footage projection from the EIR indicates 320, 166 square feet of commercial space. The project golf course will "tie-in" to the approved Oak Tree West Citrus Course, west of Jefferson street.

Specific Plan 90-017 proposes a residential and golf course community on 220 acres, 101 of which will be golf course use. 880 dwelling units are proposed (overall 4.0 UPA density overall, 7.4 acres net). The project as proposed is similar to the adjacent PGA West project to the north, and will "tie-in" with that project.

Nowhere in the DEIR is there any discussion addressing waste generation during the construction phase nor for the completed project.

In consideration of the California Environmental Quality Act (CEQA) section 15205(c) CIWMB staff will focus comments on specific issues involving waste generation and disposal.

In order to help decision-makers 1) identify potential impacts from construction and demolition projects, 2) determine whether any such impacts are significant, and 3) ascertain whether significant impacts can be mitigated to a level of insignificance, CIWMB staff request that the Final Environmental Impact Report (FEIR) include the following information:

- A.) Identification of the final disposal site(s) for the community plan's anticipated waste generation. 1
- B.) Identification of the anticipated types and quantities of solid wastes to be generated upon implementation of the plan; both during construction phases and at the project completion, including additional sewage sludge generated, which would require landfilling. 2
- C.) Identification of the potential impacts of these quantities on remaining landfill capacities and the calculated site-life associated thereof. 3
- D.) Identify any past or present areas of unpermitted landfilling and/or dumping at the Specific Plan sites and how these areas will be mitigated. 4

New residential and commercial developments increase the amount of waste being sent to landfills. To minimize the amount of solid waste going into landfills, recycling and reduction efforts should be incorporated into the city and/or county solid waste management plan. This will serve to relieve the landfill space in San Bernardino County, as well as to help achieve the mandates of the California Integrated Waste Management Act (AB939). CIWMB staff suggest that the following measures be considered in the FEIR: 5

- A.) Implementation of a curbside recycling program in the residential development areas.
- B.) Provide information to residents about the recycling services in the development area(s). Identify buy back centers and possible markets for recyclables in the area(s). Suggest to residents and businesses that they recycle glass, metal, paper, cardboard, and other materials to the maximum extent feasible.
- C.) Promote the use of insulation and other products made of recycled materials in the construction of development structures.
- D.) Promote the inclusion of recycle storage areas into the design of the residential units.
- E.) Suggest to residents and businesses that they utilize products made from recycled materials to the maximum extent possible.
- F.) Develop a composting program at the golf course to recycle grass clippings and green wastes on the development's landscapes.

Thank you for the opportunity to review and comment on the DEIR for the General Specific Plan 90-015 (Foster Turf Property), 90-016 (The Grove Property), 90-017 (PGA West 5th Course Expansion). CIWMB staff ask that you keep the Board apprised of solid waste generation, disposal, and source reduction/recycling issues associated with the planned development. For assistance with local planning issues concerning compliance with AB 939 requirements, please contact Mike Leason of the Board's Local Assistance Branch at (916) 327-0448. If you have any questions regarding these comments or would like additional assistance from CIWMB staff, please call Vincent Paul of the Environmental Review Branch, Local Planning Division, at (916) 327-2444.



**South Coast
AIR QUALITY MANAGEMENT DISTRICT**
9150 FLAIR DRIVE, EL MONTE, CA 91731 (818) 572-6200

June 13, 1991

Mr. Wallace Nesbit
City of La Quinta
78-105 Calle Estado
La Quinta, CA 92253

Dear Mr. Nesbit:

The South Coast Air Quality Management District (SCAQMD) has reviewed the following Draft Environment Impact Reports (Draft EIRs): Specific Plan 90-015; Specific Plan 90-016; and Specific Plan 90-017. SCAQMD is providing comments on each specific plan (enclosed).

SCAQMD is suggesting that a single Draft EIR be prepared for Specific Plan(s) 90-015 and 90-017 because the projects are contiguous, under the same ownership, and will demonstrate greater adverse air quality impacts if analyzed as one project. Furthermore, perhaps a single EIR could be prepared for all three projects.

The California Environmental Quality Act (CEQA) states in Section 15165:

where individual projects are...to be undertaken and where the total undertaking comprises a project with significant environmental effects, the Lead Agency shall prepare a single program EIR...as described in Section 15168."

CEQA states in Section 15168 that:

a program EIR is an EIR which may be prepared on a series of actions that can be characterized as on large project and are related...(1) geographically,...(4) as individual activities carried out under the same authorizing statutory or regulatory authority and having generally similar environmental effects which can be mitigated in similar ways.

CEQA then states the advantages of a program EIR which includes the ability to "ensure consideration of cumulative impacts that might be slighted in a case-by-case analysis."

1

SCAQMD believes that cumulative air quality impacts will be significant for the three proposed projects. In our opinion, a single EIR will better demonstrate or reflect the adverse air quality impacts that will result from the three proposed projects. If you have questions regarding the SCAQMD comment letters, or have any concerns, please call Connie Day at (818) 307-4507.

Sincerely,



Mike A Nazemi
Planning Manager

MAN:CAD:VL

Enclosures



**South Coast
AIR QUALITY MANAGEMENT DISTRICT**

9150 FLAIR DRIVE, EL MONTE, CA 91731 (818) 672-6200

June 13, 1991

Mr. Wallace Nesbit
Associate Planner
Planning and Development
78-105 Calle Estado
La Quinta, California 92370

Dear Mr. Nesbit:

**RE: Comments on the Draft Environmental Impact Report For Specific Plan 90-017 in
the City of La Quinta**

**State Clearinghouse #90020727
SCAQMD #RVC910501-03**

The South Coast Air Quality Management District (SCAQMD) has reviewed the Draft Environmental Impact Report (Draft EIR) for proposed Specific Plan 90-017. The proposed project will generate adverse short- and long-term air quality impacts which are not adequately addressed in the Draft EIR.

The SCAQMD is responsible for adopting, implementing, and enforcing air quality regulations within the Riverside County portion of the South East Desert Air Basin, which includes the project site. SCAQMD reviews and analyzes environmental documents for projects that may generate significant air quality impacts. In this capacity, SCAQMD advises the lead agency.

Attached is the SCAQMD's review of the Draft EIR including a detailed discussion of findings and recommendations. SCAQMD appreciates the opportunity to comment on the project. If you have any further questions, please contact Connie Day, Program Supervisor, at (818) 307-4507.

Sincerely,

Mike A. Nazemi
Planning Manager

MAN:CAD:TS:SRG

Attachment with Exhibit A
(SG6SPL01.DOC)

ATTACHMENT

SCAQMD REVIEW OF THE DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE SPECIFIC PLAN 90-017

The Draft Environmental Impact Report (Draft EIR) is intended to address environmental impacts associated with the approval and implementation of the following discretionary actions: a general plan amendment; a zone change; cancellation of the agricultural preserve contract; and Specific Plan 90-017 development. The proposed Specific Plan 90-017 involves the development of 220 acres of land into resort/recreational-oriented residential land uses within, and immediately south and east of the City of La Quinta within central Riverside County.

The South Coast Air Quality Management District (SCAQMD) has reviewed the Draft EIR, and recommends that the following issues be addressed or clarified in the Final Environmental Impact Report (Final EIR).

AIR QUALITY SETTING

1989 and 1990 air quality data (attached) for the City of Palm Springs and the City of Indio should be included in the Final EIR's air quality setting. 2

LEVEL OF SIGNIFICANCE

To determine the project's air quality-related significance, it is recommended that the list of thresholds recommended on pages II-1 through II-4 of SCAQMD's 1987 Air Quality Handbook for Preparing Environmental Impact Reports (EIR Handbook) be used in the Final EIR. 3

The SCAQMD estimates that mass grading (worst-case scenario) will produce approximately 24,200 pounds of dust per day. The SCAQMD threshold of significance for total particulates is 150 pounds per day. However, the Draft EIR, on page III-16, states that the estimated amount (3.9 tons per day) of particulates is insignificant compared to the total amount of particulates (138 tons per day) released in Riverside County. The Draft EIR also states that emissions will be insignificant since they are temporary. SCAQMD believes that this is not a valid method of determining the level of significance. One court case (Kings County Farm Bureau et. al. v City of Hanford 221 Cal. App. 3d at 718-721 [270 Cal. Rpt. 650, 661-662].) concurs with this assessment by stating that "to conclude that because regional levels are bad, therefore the addition of emissions from the project must be treated as insignificant by comparison is to trivialize the project's impact." 4

CONSTRUCTION-RELATED AIR QUALITY IMPACTS

The Final EIR may include a work plan as mitigation measure to ensure that daily total emissions from all of the following construction activities do not exceed the threshold levels recommended on page II-1 of SCAQMD's EIR Handbook.

For each phase of construction, the Final EIR should include emission estimates from all sources mentioned in this assessment. The Final EIR should include emissions associated with construction and the expansion of the required infrastructure including utility trenches, storm drains, circulation systems, and water/sewer facilities. 5

The Final EIR should also address the emissions related to the development of the recreational areas and the landscaping. To identify emission sources and mitigation measures, the 1989 and 1991 revision of SCAQMD's Air Quality Management Plan (AQMP) may be used. Furthermore, the Final EIR should describe whether the parking structures are underground or above ground, and should quantify the corresponding construction-related emissions. The Final EIR should also include associated emissions from all other construction activities. 6

Existing Land Use

The Final EIR should include the associated emissions from hauling soil to and from the project site during remedial work (page III-9). This remedial work will consist of the excavation, export, import and recompaction of soil to provide adequate foundation conditions for buildings. The Draft EIR, on page III-5 and III-7 states that petroleum-stained soils were observed in two relatively large areas and several smaller areas on the project site. The Final EIR should affirm that the above-mentioned remedial work will not start before results are received for tests (page III-9) proposed to determine the presence or absence of hazardous (toxic, corrosive, reactive and/or ignitable) contaminants in the soil. 7

The Final EIR should provide tests to determine soil and groundwater contamination due to the utilization of the site for farming (use, storage and handling of pesticides and fertilizers) over the past forty years. As suspected by the proponent (page III-5), if the soil or groundwater is found to be contaminated with toxic or hazardous materials, a discussion of compliance with applicable SCAQMD's rules prior to excavation and dewatering should be included.

If proposed (page III-9) bio-remediation and disposal of contaminated soil are required, SCAQMD recommends that the proponent contact the Department of Health Services. Remediation activities may require separate environmental/air quality analyses. In addition, mitigation measures should be included to eliminate emissions of hazardous chemicals during remediation, disposal, treatment and dewatering activities.

The Draft EIR states that dewatering may be needed during the erosion of water run-offs or during the construction of underground or subgrade structures. All emissions associated with the dewatering process should be included and mitigated in the Final EIR.

Demolition

The Draft EIR states (page III-8) that existing structures, including an equipment maintenance yard, will be demolished and removed prior to site grading. The Draft EIR (page III-9) states that the existing above-ground fuel storage tank, a small irrigation pump and piles of structural debris will be removed and disposed of.

The Final EIR should include sampling and testing for asbestos containing materials in existing structures prior to demolition, and in any structural debris prior to disposal. If asbestos containing materials are found, additional mitigation measures should be included beyond those listed in Rule 1403. 8

Excavation and Grading

PM10 emissions from this project are estimated to be 6,050 pounds per day. The Draft EIR (page III-42) states that the project site is located on the gentle rolling floor of the Coachella Valley (CV) and is within the Eastern CV Community Plan. The Final EIR should include the PM10 control measures recommended in SCAQMD's PM10 SIP for the Coachella Valley.

9

Architectural and Paving Materials

The Draft EIR states that Phase I of construction will consist of the development of 101 acres of land for recreational purposes including golf course, along with 28 acres of land for 207 dwelling units. Phase II and III will consist of the development of 44 acres and 47 acres of land for 326 and 347 dwelling units, respectively. Emissions from coating and paving materials associated with this development will be considerable and should be included in the Final EIR. SCAQMD's 1980 emissions inventory estimated 160,000 pounds of volatile organic compounds from Basinwide usage of medium cure cutback asphalt (emission factor being 320 pounds per ton).

10

Architectural materials are defined in Rule 1113 and paving materials are defined in Rule 1108 and Rule 1108.1. The volatile organic compound (VOC) content of such materials may be calculated by using an estimated amount of these materials and product formulation data provided by the manufacturer on the Material Safety Data Sheets (use few samples) or product labels.

Fuel Combustion

The Draft EIR identifies certain mobile source emissions from construction-related exhausts, but does not include emissions from construction-related truck loads that will be used for moving soil and building material, and from passenger vehicles used by construction workers. The Final EIR should estimate and quantify the vehicles by type, that will be used during demolition and construction. Emission estimates by the type of fuel used, and by vehicle category for each phase of construction, along with associated mitigation measures should be included in the Final EIR. The speed-based (miles-per-hour) EMFAC7EP factors by calendar year may be used. These factors are available from the California Air Resources Board (ARB) by calling (916) 324-7156.

11

The source of the electrical energy for construction-related activities and associated emissions should be included in the Final EIR. Additional mitigation measures should be considered to reduce these emissions.

12

LONG-TERM AIR QUALITY IMPACTS

The Final EIR should quantify emissions from project-related secondary operations, such as recreational activities and landscape maintenance activities. The Final EIR should then discuss the project's overall significance by comparing the applicable total emissions from all of the project-related long-term sources with the applicable threshold limits stated in Rule 212, Regulation XIII and the EIR Handbook.

13

Mobile Sources

To estimate vehicular emissions, the Draft EIR may have utilized EMFAC7C emission factors with URBEMIS2 and CALINE3 computer models. These estimates are acceptable for this project. For future projects, the speed-based (miles-per-hour) EMFAC7EP factors by calendar year should be used, along with a computer model equivalent to URBEMIS3 and CALINE3.

The Draft EIR states that, after completion, the proposed project will generate an estimated 16 tons of solid waste per day. Emissions associated with the transport of solid waste and sludge to landfills and recycling or composting facilities should be included in the Final EIR. The Final EIR should include the type of golf carts proposed to be used on the golf course. Golf carts should be operated on electricity or clean fuels.

To reduce mobile emissions, SCAQMD recommends that the proposed Transportation Demand Management (TDM) program be revised in the Final EIR to include additional strategies to achieve a 1.5 Average Vehicle Ridership (AVR) for two-way commute trips using information presented in A Reference Guide To Transportation Demand Management, published by the Southern California Association of Governments.

Health Risk-Related Issues

A discussion relative to compliance with AB 3205 should be included in the Final EIR. Assembly Bill (AB) 3205 prohibits the approval of an EIR or a Negative Declaration for construction of a new project or facilities within a 0.25 mile radius of an existing school site unless its requirements are met, such as the school district is notified, and that the lead agency has consulted with the city or county to identify potential of emitting hazardous (toxic, ignitable, corrosive and reactive) materials from new project or facilities, and the school district has made these specified findings.

The Draft EIR states (page III-96) that the project is designed and aimed at older, semi-retired homeowners. In addition to the health risk associated with exposure to background air contaminants from current pesticide spraying on the project site, these older residents could be exposed to toxic air contaminants and other criteria pollutants emitted by the adjacent farming activities and by blowsand. The Final EIR should address these issues. The Draft EIR, on page III-15, states that the project vicinity has been defined as a "Blowsand Hazard Zone." SCAQMD's 1990 report entitled, State Implementation Plan for PM10 in the Coachella Valley should be consulted for health concerns associated with blowsand, and for additional mitigation measures.

CUMULATIVE AIR QUALITY IMPACTS

The Final EIR should include emission estimates separately for each of the related projects reported on page III-44 of the Draft EIR, and in Specific Plans 90-015, 90-016 and 90-017. The total (of emissions) should be compared with SCAQMD's threshold levels.

The Draft EIR indicates that the greatest cumulative impact on regional air quality will arise from the incremental addition of pollutants from increased traffic and energy consumption. Additional regional transportation and parking management strategies should be considered, and included in the Final EIR as mitigation measure, aimed at further reducing vehicle travel and increasing AVR.

ALTERNATIVES

Potential exposure to toxic air contaminants and proximity to hazardous chemicals that might currently be released into the air from pesticide spraying, and sand from adjacent blowsand hazard zones, should be given significant consideration when selecting between alternative sites.

MITIGATION MEASURES

SCAQMD recommends that additional mitigation measures as listed in Exhibit A be included in the Final EIR to reduce air quality impacts below the level of significance provided in SCAQMD's EIR Handbook. A mitigation monitoring and reporting plan, a compliance reporting form, and the name of the agency that would administer the mitigation monitoring program should be included in the Final EIR.

20
21

SCAQMD recognizes that parts of the Specific Plan 90-017 are not certain at this time. Future constructions and operations may require separate environmental review. SCAQMD recommends that all new projects within the Specific Plan be required to comply with the air quality mitigation measures proposed in this letter.

(SG6SPLQ2.DOC)

EXHIBIT A

MITIGATION MEASURES FOR POTENTIAL EMISSION SOURCES

1. Limit Emissions From Vehicle Trips:

- o Introduce measures described in A Reference Guide to Transportation Demand Management (TDM) published by the Southern California Association of Governments and SCAQMD's Regulation XV.
- o Participate and encourage transportation system management programs by adding park-and-ride lots, additional bus or transit stops, shuttle services, preferential parking for ridesharers, reversible and one-way streets where needed, bicycle parking facilities, bicycle lanes, and pedestrian walkways.
- o Develop a City Air Element and local ordinances to reduce vehicle miles traveled by the community.
- o Encourage developers of commercial centers to reduce the number of trips that an individual makes from home or work by introducing compressed work weeks, telecommuting, and the combining of non-work trips.
- o Encourage developers of commercial centers to reduce trips out of the most congested periods and spread them throughout the day by introducing alternative work hours, flexible work hours, staggered work hours and user fees for parking spaces.
- o Encourage developers of commercial centers to reduce vehicle trips associated with employee vehicles, and passenger or goods fleet vehicles by introducing ridesharing incentives, walking and bicycling incentives, parking management programs, auto use restriction programs and truck movement restriction programs.
- o Encourage developers of commercial centers to introduce employee incentive packages that include rideshare matching services, preferential parking for ridesharers, bicycle racks, lockers, shower rooms, free information on transit services, free transit passes, and guaranteed ride home programs.
- o Educate residents and operators of commercial centers through brochures, classes, etc., regarding the importance of reducing vehicle miles traveled and the related air quality impacts.

2. Minimize Indirect-Source Emissions:

- o Include energy costs in capital expenditure analyses.
- o Incorporate appropriate passive solar design.
- o Minimize electricity distribution losses.
- o Limit installed lighting loads.
- o Install lamps which give the highest light output per watt of electricity consumed.
- o Control mechanical systems or equipment with time clocks or computer systems.
- o Recycle lighting system- or process-heat for space heating during cool weather, and exhaust this heat via ceiling plenums during warm weather.
- o Cascade ventilation air from high-priority (occupied spaces) areas to low-priority (corridors, equipment and mechanical spaces) areas before being exhausted.

3. Minimize Open Area Wind Erosion:

- o Reduce the transport of blowsand adjacent to paved roadways and residential areas by: chemically stabilizing soil surfaces within at least 100 feet (on the windward sides) of roadways or residential areas; and establishing snow fence windbreaks within fifty feet (on the windward sides) of roadways or residential areas.
- o Establish tree windbreaks immediately downwind of habitat preserves and other strategic open areas.
- o Require property owners of vacant lots with visible crustal disturbances or active blowsand accumulations within areas of incorporated cities to restore vegetative

ground covering so that fifty or more percent of the surface area is covered by vegetation within one year of planting. As an option, property owners may use chemical stabilizers to cover 90 percent or more of the property on an annual basis.

- o Prohibit earth/soil moving operations on days when wind gusts exceed or are expected to exceed 20 miles per hour. (SCAQMD will issue daily forecasts of expected wind conditions on a taped message.)
 - o Require paving or chemical stabilization of wind-generation-area maintenance roads.
4. **Minimize Surrounding Agricultural Area Wind Erosion:**
- o Prohibit tilling operations on days when wind gusts are expected to exceed 20 miles per hour. (SCAQMD will issue daily forecasts of expected wind conditions on a taped message.)
 - o Require agricultural fields to be watered prior to tilling operations.
 - o Require watering of established ground cover prior to mulching operations.
 - o Improve agricultural operation, to include strip cropping, row spacing, and tilling practices.
5. **Minimize Particulate Emissions from Unpaved Roads:**
- o Chemically treat unpaved road surfaces (public and private): with activity level of 20 vehicle trips per day or more; with a targeted minimum of forty-percent or more of all qualifying unpaved roads; and with priorities set by distance within and from population centers.
 - o Control dust from primary farm roads: with activity level of 20 vehicle trips or more per day; and by using chemical stabilizers or water saturation.
 - o Require paving of unpaved parking lots (public and private) for lots holding a volume of 1,500 or more vehicles per year. For infrequent (totally unused for at least 330 days per year), but high volume usage, chemical stabilization may be substituted for paving provided that chemical stabilizers are applied 10 and 20 days before an event.
 - o Set maximum speed limit on unpaved roads at 15 miles per hour.
6. **Minimize Particulate Emissions from Paved Roads:**
- o Establish sand-removal programs: to remove visible sand/dirt accumulations from paved road surfaces; and on a post-event basis, combined with routine street inspections.
 - o Enhance routine street cleaning/sweeping programs.
 - o Reduce emissions from unpaved shoulders by chemical stabilization within 200 feet of intersections and within 25 feet of driveways.
 - o Require contractors to pave construction access roads as soon as access roads are created: paving must extend from the paved roadway into the construction area at least 120 feet in length; and paving must be cleaned at the end of each work day.
 - o Ban the use of leaf blowers.
7. **Minimize Particulate Emissions from Construction/Demolition Activities:**
- o Comply with SCAQMD's Rule 1403.
 - o Phase grading to prevent the susceptibility of large areas to erosion over extended periods of time.
 - o Schedule activities to minimize the amount of exposed excavated soil during and after the end of work periods.
 - o Dispose of surplus excavated material in accordance with local ordinances and use sound engineering practices.
 - o Cover exposed soils whenever possible.
 - o Sweep streets if silt is carried over to adjacent public thoroughfares.
 - o Require a phased schedule for construction activities to even out emission peaks.

- o Suspend grading operations during first and second stage smog alerts, and during high winds in accordance with the requirements of Rule 403.
- o Wash off trucks leaving site.
- o Obtain haul route approval and guidelines for all excavated material from the City Department of Building and Safety.
- o Maintain construction equipment engines by keeping them tuned.
- o Use clean and low-sulfur fuel for equipment.
- o Require watering of all active projects with multiple daily applications, if necessary, to assure proper dust control. The water should be reclaimed or agricultural canal type, whenever available.
- o Require the chemical treatment of unattended (disturbed lands which have been, or are expected to be unused for four or more consecutive days) construction areas.
- o Prohibit all construction grading activities on days when the wind gusts exceed or are forecast to exceed 20 mph. (SCAQMD will issue daily forecasts of expected wind conditions on a taped message.)
- o Require trucks to maintain at least two feet of freeboard. (i.e., the distance between the top of the load and the top of the truck bed sides).
- o Require all trucks hauling dirt, sand, soil, or other loose substances and building materials to be covered.
- o Require planting of tree windbreaks when adjacent to open lands or lots, and on the windward perimeter of construction projects.
- o Encourage the planting of vegetative ground cover as soon as possible on construction sites.
- o Require the installation of wheel-washers to all existing trucks.
- o Irrigate barren fields.
- o Restrict off-road vehicle use.
- o Prohibit parking on unpaved parking lots.
- o Limit the vehicle weight permitted on an unpaved road or area.
- o Lower vehicle speed limits on unpaved roads (a program of planned enforcement activities is required to support this control option).
- o Cover the road surface with material of lower silt content (a program of planned maintenance is required to support this control option).
- o Use turf blocks, instead of paving, for driveway areas with low vehicle miles traveled and emergency accesses.
- o Install liners on truck beds.
- o Require trucks to be covered.
- o Install vehicle wheel-washers before the roadway entrance at construction sites.
- o Pave construction access roads.
- o Clean up the access roads and public roadways of soil, if necessary.
- o Require paving, curbing, and vegetative stabilization of the unpaved areas adjacent to roadways on which vehicles could potentially drive (i.e., road shoulders).
- o Develop adequate storm water control systems.
- o Use vegetative stabilization whenever possible to control soil erosion from storm water.
- o Develop programs for the rapid cleanup of street debris after a major storm event.
- o Prohibit outdoor storage of fine particulate matter.
- o Use chemical stabilizers or snow fences on the upwind open areas adjacent to roadways.
- o Develop programs for the rapid cleanup of accumulated blowsand on streets immediately after blowsand events.