CITY OF RANCHO MIRAGE

HAZELDEN BETTY FORD CENTER

PRELIMINARY DEVELOPMENT PLAN PROJECT

DRAFT ENVIRONMENTAL IMPACT REPORT

SCH No. 2019120372



Prepared for

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Hazelden Betty Ford Center Preliminary Development Plan Project

DRAFT ENVIRONMENTAL IMPACT REPORT

EXECUTIVE SUMMARY & ENVIRONMENTAL MATRIX

INTRODUCTION

The City of Rancho Mirage (City) has prepared this Environmental Impact Report (EIR) to evaluate the potential environmental impacts related to the proposed update and modernization of facilities at the Hazelden Betty Ford Center Rancho Mirage Campus (Proposed Project or Project). The City is the Lead Agency under the California Environmental Quality Act (CEQA) for this Proposed Project.

The EIR has been prepared in accordance with CEQA (as amended) (Public Resources Code §§21000-21189.57) and the State CEQA Guidelines (California Code of Regulations, Title 14, Chapter 3, §§15000-15387). Under State CEQA Guidelines §15121 (Informational Document):

- *An EIR is an informational document which will inform public agency decisionmakers and the public generally of the significant environmental effect of a project, identify possible ways to minimize the significant effects, and describe reasonable alternatives to the project. The public agency shall consider the information in the EIR along with other information which may be presented to the agency.*

- *While the information in the EIR does not control the agency's ultimate discretion on the project, the agency must respond to each significant effect identified in the EIR by making findings under Section 15091 and if necessary by making a statement of overriding consideration under Section 15093.*

- *The information in an EIR may constitute substantial evidence in the record to support the agency's action on the project if its decision is later challenged in court.*

Under State CEQA Guidelines §15123, this Executive Summary describes the proposed Project, potentially significant impacts, and required avoidance, minimization and mitigation measures. Also identified in this chapter is a summary of the alternatives to the project evaluated in this Draft EIR (Draft EIR or DEIR), including those that would avoid potentially significant effects; issues of concern/areas of controversy known to the Lead Agency; and issues to be resolved, including the choice among alternatives and how best to mitigate the potentially significant effects.

The reader should review, but not rely exclusively on the Executive Summary as the sole basis for judgment of the proposed Project and alternatives. The complete DEIR should be consulted for specific information about the potential environmental effects and mitigation measures to address those effects.

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SUMMARY OF THE PROPOSED PROJECT

The Hazelden Betty Ford Center (HBFC) was established in 1982 on the easterly 26.22± acres of the Eisenhower Medical Center (EMC) Campus in Rancho Mirage. The HBFC provides a wide range of treatment protocols, including bio-psycho-social assessments and evaluation, medical detox, residential and outpatient substance abuse treatment, nearby sober living homes, education and support for families and children, and post-rehab continuing care groups. The facility provides residential drug and alcohol treatment, residential rehabilitation programs, and out-patient programs in a supportive and affirming campus environment.

New Residential Buildings

The proposed changes to the HBFC campus include the removal of four residential buildings totaling 51,694± square feet and currently providing a total of 80 beds. These four buildings will be replaced by two 2-story residential buildings, each providing 46 beds for a total of 92 beds. Each will have an overall height of 30± feet. Each level of the new residential buildings will also include a kitchen, community room, office and ancillary space. Each new residential building will encompass 30,935± square feet for a total of 61,870± square feet.

New Day-Treatment Building

The Project also includes the construction of a new one-story, 22,748± square foot day-treatment building to be located on a currently vacant and undeveloped portion of the campus immediately west of Vista Del Sol. This building will be located approximately 100 feet west of the east HBFC property line. This new building will house 44 day-treatment beds, associated support space, and 6,400 square feet of administrative space including a computer lab and lecture hall.

Vista Del Sol Access Drive

The proposed Project includes the development of a new primary access onto the HBFC campus from the adjoining Vista Del Sol. Bounding the subject property on the east, this roadway extends south to a signalized intersection at Country Club Drive, and north to a stop-controlled intersection at Frank Sinatra Drive. A new access drive of approximately 24-30 feet wide is planned, which will proceed west into the campus and connect to the existing on-site circulation network. Appropriate signage is also proposed at this location.

Ancillary Site Modifications

In addition to removing four existing buildings and constructing three new ones, the Project proposes limited modifications to the existing site plan. In addition to new and modified on-site stormwater retention ponds, the new site plan adds a labyrinth and updated gardens and open spaces areas, with an increased emphasis on desert and drought-tolerant landscaping. Several small outbuildings, including mechanical equipment and smoking pavilions, are also planned.

STATEMENT OF PROJECT OBJECTIVES

Under State CEQA Guidelines §15124(b), the project description shall include a statement of objectives. These objectives have been designed to assist the City in developing a reasonable range of project alternatives to evaluate in the DEIR and aid the decision-makers in preparing findings or a statement of overriding considerations, if necessary.

The project objectives are intended to address the purpose of the HBFC PDP Project. The City has identified the following list of criteria as the objectives for the project.

- Complete a comprehensive update to the Hazelden Betty Ford Center campus master site plan
- Replace older and outdated residential treatment buildings with modern, more efficient facilities
- Broadened capabilities including a new stand-alone day-treatment facility
- New primary access from Vista Del Sol with appropriate entry and arrival statement
- Renovated site landscaping with increased use of desert and drought-tolerant landscape materials
- Integrated renewable energy systems that reduce reliance on SCE grid sources
- Enhance the Center's ability to meet the changing regimens for treating patients with a substance use disorder

SUMMARY OF PROJECT IMPACTS AND MITIGATION MEASURES

Section 2, Environmental Setting, Impacts, and Mitigation Measures, of this DEIR presents the environmental impact analyses for all CEQA resource topics identified for further analysis in the Project's Initial Study and Notice of Preparation (IS/NOP) and identifies mitigation measures to reduce significant impacts to a less than significant level, where appropriate and feasible. A summary of all potential environmental impacts and mitigation measures from Section 2 is provided in the Mitigation Monitoring and Reporting Program (MMRP) at the end of this summary. The MMRP is intended to provide a summary of the Project's impacts and mitigation measures; please refer to Section 2 of the EIR for the complete discussion and analysis. The DEIR analysis indicates that implementation of the Proposed Project will not result in any unmitigable environmental impacts. Therefore, no statement of overriding considerations is expected to be needed.

ALTERNATIVES SUMMARY

Section 3, Alternatives, of this DEIR presents the alternatives analysis for the proposed Project. State CEQA Guidelines §15126.6 requires that an EIR describe and evaluate the comparative merits of a range of alternatives to the project that could feasibly attain most of the objectives of the project but would avoid or substantially lessen any significant adverse effects of the project. An EIR is not required to consider every conceivable alternative to a project; rather, it must consider a reasonable range of potentially feasible alternatives that will foster informed decision-making and public participation. The State CEQA Guidelines further state that the specific alternative of "no project" shall also be evaluated. The alternatives evaluated in this DEIR were identified based on input from HBFC and identification of the project's significant environmental impacts in this DEIR. The alternatives were selected in consideration of one or more of the following factors:

- Extent to which the alternative would accomplish most of the basic objectives of the project;
- Extent to which the alternative would avoid or lessen any of the identified significant adverse environmental effects of the project;
- Feasibility of the alternative, taking into account site/geographic suitability, economic viability, constructability, and consistency with regulatory requirements; and

- Appropriateness of the alternative in contributing to a reasonable range of alternatives necessary to permit a reasoned choice by decision-makers.

In consideration of the above factors, the following alternatives were selected to be addressed in this DEIR.

Alternative A – Less Intense Development
This alternative provides an opportunity to gauge the effects of the proposed Project against a less intense development alternative, which results in fewer additional patient beds and less overall square footage. An overall 25% reduction in the intensity of new uses is assumed for this alternative versus the proposed Project. This alternative also assumes that access to the HBFC campus would continue to be limited to Betty Ford Way within the Eisenhower Medical Center Campus. (See Section 3.1.3 for further details).

Alternative B – More Intense Alternative
This alternative allows the gauging of effects of a greater intensification of the proposed land use, which results in a greater increase in the number of patient beds and an overall increase in square footage compared to the proposed Project. An overall 50% increase in the intensity of new uses is assumed for this alternative. This alternative also assumes that primary access to the HBFC campus would be from Visa Del Sol, as with the proposed Project. Accessible secondary/emergency/delivery access would be limited to Betty Ford Way within the Eisenhower Medical Center Campus. (See Section 3.1.4 for further details).

Alternative C – No Project Alternative
The No Project alternative would maintain the status quo on the subject property. The overall intensity of development and operations would remain largely as they exist today. Sole HBFC campus access would continue to be via John Sinn Road and the internal EMC roadway network. (See Section 3.1.5 for further details).

ISSUES OF CONCERN/AREAS OF CONTROVERSY

When a Lead Agency determines that an EIR is required for a project, a Notice of Preparation (NOP) must be prepared and submitted to the State Clearinghouse, and responsible and trustee agencies. In addition, the City provided a copy of NOP to the Riverside County Clerk; mailed the NOP to the proposed project distribution list; and published the NOP in The Desert Sun newspaper (refer to Appendix A for these materials).

The purpose of the NOP is to provide responsible and trustee agencies, and the public, with sufficient information describing the proposed project and the potential environmental effects, to enable interested parties/persons to make a meaningful response.

The City issued the NOP for the Project on December 16, 2019 for a 30-day public review period which concluded on January 16, 2020. Eight (8) comment letters were received from the following agencies: South Coast Air Quality Management District (SCAQMD), California Department of Fish and Wildlife (CDFW), Coachella Valley Water District (CVWD), SunLine Transit Agency, the Native American Heritage Commission (NAHC), Desert Sands Unified School District (DSUSD), the Twenty-nine Palms Band of Mission Indians, and the Office of Planning and Research (OPR) (see Appendix A). In addition, one (1) comment email was received from Peter Tynberg, M.D., a property owner in Rancho Mirage. In general, comments were limited to requesting that further detail be provided in the EIR, and immediate responses were not required by CEQA. Those who provided comments will receive proper notification and DEIR materials during the public comment period process.

Based on the comments received on the NOP and at the scoping meeting, the following issues of concern were raised about the Project:

1. SCAQMD is requesting a copy of the DEIR and appendices or technical documents related to air quality and greenhouse gas analyses and electronic versions of all air quality modeling files. The requested analysis is addressed in EIR in Sections 2.4 Air Quality and 2.8 Greenhouse Gas Emissions. The City will submit the requested documents and materials to SCAQMD when the EIR is circulated for public comment.

2. The CDFW's primary concern is the conservation, protection, and enhancement of fish and wildlife resources and their habitats. The CDFW requests that the EIR address and analyze sensitive species, associated habitats, and mitigation/conservation lands in the Project area, as well as Project impacts, cumulative impacts, and impacts of alternative projects. Analysis of biological resources is provided in EIR Sections 2.5 and 3.5, Biological Resources.

3. The Coachella Valley Water District summarized its stormwater management, domestic water, and sanitation responsibilities and services in the Project area. It explained that the Project will be responsible for on-site retention of its incremental increase in stormwater runoff and that CVWD would determine the terms and conditions for any Project-related expansions to the water and sewer systems. Analysis of stormwater management as it pertains to the proposed Project is provided in EIR Section 2.10, Hydrology, and analysis of water and sewer services is provided in Section 2.17, Utilities.

4. SunLine Transit Agency described its current services in the Project area and provided guiding principles for internal pedestrian access. SunLine indicated it is not requesting the inclusion of any transit amenities as part of the proposed Project. SunLine's facilities and services in the Project area are described in EIR Section 2.16, Transportation and Traffic.

5. The Native American Heritage Commission summarized portions of Assembly Bill 52 and Senate Bill 18, as well as NAHC's recommendations for conducting cultural resources assessments. Analysis of cultural and tribal cultural resources in the Project area, and Project-related contact with local tribal authorities per NAHC's recommendations and established protocols, is provided in EIR Section 2.6, Cultural and Tribal Cultural Resources.

6. The DSUSD summarized the portion of the NOP that indicated there would be no impact to DSUSD. DSUSD noted that because the NOP indicates there will be new and/or additional square feet of building and additional beds proposed, that the Project would impact DSUSD and be subject to school mitigation fees. Discussion of the Project's responsibility to pay the mandated school mitigation fees is provided in EIR Section 2.15, Public Services.

7. The Twenty-nine Palms Band of Mission Indians indicated that the Project has the potential to impact unknown resources, especially in the underdeveloped portion of the project, and requests that a Tribal Monitor accompany any archaeologist during the survey of the property. In addition, the Tribe requests a copy of the completed cultural report for review, at which time the Tribe may provide further recommendations. Analysis of cultural and tribal cultural resources in the Project area, and Project-related contact with local tribal authorities, is provided in EIR Section 2.6, Cultural and Tribal Cultural Resources.

8. Peter Tynberg, M.D. stated that any new access between any EMC location and Vista Del Sol (except an emergency access) would be inappropriate and the City has an obligation to protect nearby properties from inappropriate traffic. City staff responded via email, providing information about the upcoming public scoping meeting addressing the Project, and indicating that a Project-specific Traffic Impact Analysis and EIR would be prepared to inform the decision-making process. Potential Project-related impacts associated with the new access point are analyzed in EIR Section 2.16, Transportation and Traffic, and the Project's Traffic Impact Analysis (EIR Appendix H).

9. The Office of Planning and Research State Clearinghouse and Planning Unit provided a general courtesy notice to all reviewing agencies regarding the Project's Notice of Preparation, reminding the agencies to comment in a timely manner. The OPR letter also provided the appropriate contact and address of where to send comments. No additional Project-specific comments were provided.

The City of Rancho Mirage hosted a Public Scoping Meeting on January 8, 2020 from 2:00 to 4:00 p.m. and served the purpose of educating and informing the public about the proposed PDP Project, addressing public questions and concerns, and collecting input on the CEQA process. The first part of the scoping meeting included a 5-minute Power Point presentation followed by an open house format where the public was able to review project exhibits and discuss the environmental review process with project team members. Comment cards and note pads were also used to record comments and questions raised by attendees. One member of the public attended the public scoping meeting (see Scoping Meeting report in Appendix A) and voiced general support for the proposed Project. Beyond a second-hand conveyance of property owners concerns regarding future traffic on Vista Del Sol, no other specific areas of concern were identified through the formal CEQA public scoping process.

MITIGATION MONITORING & REPORTING PROGRAM
Hazelden Betty Ford Center PDP Project
Draft EIR/ SCH No. 2019120372

Resource Topic	Level of Impact After Mitigation	Mitigation Measures	Responsible Party/ Monitoring Party	Implementation Timing
Aesthetics	Less Than Significant	AES-1 Landscaping plans and materials applied to the perimeter of the campus shall serve to create a harmonious transition between the campus and surrounding environment. Visual order in landscape designs and materials shall be used to establish or enhance visual order to streetscapes, parking areas, building perimeters and open space areas.	HBFC, Project Contractor	Prior to approval of landscaping plan.
	Less Than Significant	AES-2 Free-standing walls and fences, where contemplated, shall be constructed as so as to minimize impacts to scenic vistas to the greatest extent practicable, and to define and delineate surrounding areas. Project landscaping should frame views, obscure or soften hard edges and enhance security.	HBFC, Project Contractor	Prior to approval of landscaping plan and site plans.
	Less Than Significant	AES-3 All outdoor lighting shall be in compliance with the Section 17.18.050 of the Rancho Mirage Municipal Code and applicable Specific Plan guidelines. Other lighting recommendations include the following: a. Outdoor lighting shall be limited to the minimum height, number and intensity of fixtures needed to provide security and identification, taking every reasonable effort to preserve the community's night skies. b. Lighting fixtures shall be of appropriate scale, style and character of the architecture. No lighting which incorporates flashing, pulsing or is otherwise animated shall be permitted. c. The intensity of light at the boundary of the HBFC campus shall not exceed seventy-five (75) foot lamberts from a source of reflected light. d. All lighting shall be directed onto the site and away from adjacent properties with appropriate shielding, and minimal fixture height to ensure minimum impact on adjoining lands and streets. e. Elevated lighting, including but not limited to parking lot lighting, shall be full-cutoff fixtures. Drop or sag lens fixtures shall not be permitted.	HBFC, Project Contractor	Prior to approval of landscape/lighting plan.

Resource Topic	Level of Impact After Mitigation	Mitigation Measures	Responsible Party/ Monitoring Party	Implementation Timing
Aesthetics Cont.	Less Than Significant	AES-4 Landscape lighting shall be shielded to direct and limit areas of illumination to the subject property. No up-lighting that spills into the night sky shall be used on the campus. Landscape lighting shall be included with the final landscape plans.	HBFC, Project Contractor	Prior to approval of landscape/lighting plan.
		AES-5 Exterior building and other security lighting shall be integral to the building architecture and/or landscape plan, shall avoid excessive lighting levels and direct and shield illumination to protect adjoining properties and night skies.	HBFC, Project Contractor	Prior to approval of landscape/lighting plan.
		AES-6 All on-site electrical power lines shall be installed underground. Transformers and other power conditioning equipment shall be pad-mounted or placed in underground vaults, as determined appropriate by the HBFC and Southern California Edison (SCE). Existing SCE transmission lines in the future Visa Del Sol right of way are not required to be undergrounded.	SCE, HBFC, Project Contractor	Concurrent with project construction.
		AES-7 Final (FDP) site plan, architectural elevations, including building materials and colors, landscaping and lighting, and other design elements that affect the appearance of the HBFC campus shall substantially conform with those set forth in the subject HBFC PDP Project.	HBFC, Project Contractor	Prior to approval of site plan, architectural elevations, and landscape/lighting plans.
Air Quality	Less Than Significant	AQ-1 <u>Dust Control Plan: SCAQMD Rule 403.1</u> SCAQMD Rule 403 (403.1 specific to the Coachella Valley): A Dust Control Plan shall be prepared and implemented by all contractors during all construction activities, including ground disturbance, grubbing, grading, and materials import and export. Said plan shall include but not be limited to the following best management practices: • Treated and stabilized soil where activity will cease for at least four consecutive days; • All construction grading operations and earth moving operations shall cease when winds exceed 25 miles per hour; • Water site and equipment morning and evening and during all earth-moving operations; • Operate street-sweepers on impacted paved roads adjacent to site; • Establish and strictly enforce limits of grading for each phase of construction;	HBFC, Project Contractor	Approved dust control plans prior to site disturbance. Adherence to the confirmed plans during all project plan reviews.

Resource Topic	Level of Impact After Mitigation	Mitigation Measures	Responsible Party/ Monitoring Party	Implementation Timing
		• Wash off trucks as they leave the project site to control fugitive dust emissions • Cover all transported loads of soils, wet materials prior to transport, provide freeboard (space from the top of the material to the top of the truck) to reduce PM_{10} and deposition of particulate matter during transportation • Use track-out reduction measures such as gravel pads at project access points to minimize dust and mud deposits on roads affected by construction traffic.		
Air Quality Cont.	Less Than Significant	AQ-2 SCAQMD Rule 402: The project shall adhere to nuisance odor abatement requirement.	HBFC, Project Contractor	Approved dust control plans prior to site disturbance. Adherence to the confirmed plans during all project plan reviews.
		AQ-3 SCAQMD Rule 1113 (Architectural Coatings): All application of architectural coatings shall adhere to Rule 1113 requiring the use of low VOC coatings.	HBFC, Project Contractor	Concurrent with project construction.
		AQ-4 Tier 4 Off-Road Emission Standards: requires that all construction equipment meet or exceed the California Air Resources Board (CARB) and U.S. Environmental Protection Agency (USEPA) Tier 4 off-road emissions standards for equipment rated at 50 horsepower or greater during Project construction.	HBFC, Project Contractor	Approved dust control plans prior to site disturbance. Adherence to the confirmed plans during all project plan reviews.
Biological Resources	Less Than Significant	BIO-1 Payment of CVMSHCP Fees Prior to the issuance of grading permits or other site-disturbing authorizations for currently undisturbed lands, the Project proponent shall pay the CVMSHCP local development mitigation fee to mitigate for impacts to covered species and natural communities within the Project site.	HBFC, Project Contractor	Prior to issuance of grading permits or other site-disturbing authorizations.

Resource Topic	Level of Impact After Mitigation	Mitigation Measures	Responsible Party/ Monitoring Party	Implementation Timing
Biological Resources Cont.	Less Than Significant	BIO-2 <u>MBTA Compliance</u> For any grading or other site disturbance or tree or vegetation removal occurring during the nesting season between February 1st and August 31st, a qualified biologist shall conduct at least one nesting bird survey, and more if deemed necessary by the consulting biologist, immediately prior to initiation of project-related ground disturbing activities. If nesting birds are present, including but not limited to burrowing owl, no work shall be permitted near the nest until the young birds have fledged. While there is no established protocol for nest avoidance, when consulted, the CDFW generally recommends avoidance buffers of about 500 feet for birds-of-prey, and 100 – 300 feet for songbirds.	HBFC, Project Contractor, Project Biologist	In the event ground disturbance occurs during the referenced time frame, prior to ground disturbance.
	Less Than Significant	BIO-3 If burrowing owls are detected during the pre-construction MBTA nesting bird survey, the applicant shall have the undeveloped portions of the subject property surveyed in a manner consistent with the CDFW Burrowing Owl Survey Protocol including the following: A "take avoidance survey" for the burrowing owl no less than 14 days (in accordance with the Staff Report on Burrowing Owl Mitigation [CDFW 2012]) and no more than 30 days prior to groundbreaking activities are required within and outside of project areas that contain suitable habitat for this species. Additionally, a final survey must be conducted within 24 hours of the initiation of ground disturbance activities in accordance with the CDFW 2012 protocol. a. If no burrowing owls are detected during those surveys, implementation of ground disturbance activities could proceed without further consideration of this species assuming there is no lapse between the surveys and construction as the protocol states "time lapses between Project activities trigger subsequent take avoidance surveys including but not limited to a final survey conducted within 24 hours prior to ground disturbance." b. If burrowing owls are detected during the take avoidance surveys, avoidance and minimization measures would then be required and could include the establishment of a buffer zone, the passive or active relocation of the individual(s) or other measures approved by the CDFW.	HBFC, Project Contractor, Project Biologist	In the event ground disturbance occurs during the referenced time frame, prior to ground disturbance.

Resource Topic	Level of Impact After Mitigation	Mitigation Measures	Responsible Party/ Monitoring Party	Implementation Timing
Cultural and Tribal Resources	Less Than Significant	CUL-1 Monitoring If any buried cultural materials are discovered during Project-related earth-moving operations, all work within 50 feet of the discovery should be halted or diverted until a qualified archaeologist can evaluate the nature and significance of the finds. The archaeologist shall prepare a findings report summarizing the methods and results of the investigation, including an itemized inventory and detailed analysis of recovered artifacts upon completion of field and laboratory work. The report shall include an interpretation of the cultural activities represented by the artifacts and discussion of their significance. The submittal of the report to the City and Tribal representative, as appropriate, along with final disposition of the recovered artifacts in a manner consistent with determination of the lead agency, Project archaeologist, and consulting tribes, will signify the completion of the monitoring program and, barring unexpected findings of significance, the mitigation of potential project impacts on cultural and tribal resources.	HBFC, Project Contractor, Project Archaeologist	Prior to any site disturbance. During all phases of construction.
	Less Than Significant	CUL-2 Prior to the initiation of new site disturbance, the applicant shall notify the Tribal staff of the Agua Caliente Band of Cahuilla Indians and the Twenty-Nine Palm Band of Mission Indians, and coordinate their appointment of a Native American Cultural Monitor for specific excavation activities.	HBFC, Project Contractor, Project Archaeologist	Prior to any site disturbance. During all phases of construction.
	Less Than Significant	CUL-3 Human Remains Should buried human remains be discovered during grading or other construction activities, in accordance with State law, the County coroner shall be contacted. If the remains are determined to be of Native American heritage, the Native American Heritage Commission and the appropriate local Native American Tribe shall be contacted to determine the Most Likely Descendant (MLD).	HBFC, Project Contractor, Project Archaeologist	Prior to any site disturbance. During all phases of construction.
Geology and Soils	Less Than Significant	GEO-1 California Building Code Final design and engineering shall conform to the prevailing California Building Code (CBC), in order to mitigate the effects of ground shaking and earthquake damage. The CBC lateral force requirements should be considered a minimum design standard, and the project proponent may develop performance-based criteria that suit the project needs.	HBFC, Project Engineer	Prior to approval of construction plan set.

Resource Topic	Level of Impact After Mitigation	Mitigation Measures	Responsible Party/ Monitoring Party	Implementation Timing
Geology and Soils Cont.	Less Than Significant	GEO-2 Structural Foundation/Ground Improvements Structural foundation designs and subsurface soil improvements shall be conducted as recommended in the geotechnical report and based on the California Code of Regulations Volume 18, Title 14, Article 10, Section 3721[a]) to minimize liquefaction hazards. Such measures shall include but are not limited to over-excavation and moisture conditioning and recompaction of soils. The Structural Engineer will need to take the structural loading and geotechnical parameters in the geotechnical report into consideration for footing design and reinforcing. A minimum footing depth of 12 inches below lowest adjacent grade shall be maintained.	HBFC, Project Contractor, Project Geologist	Prior to approval of construction plan set. During construction.
	Less Than Significant	GEO-3 Dust Control/Soil Erosion Plan All grading plans shall include a soil erosion prevention/dust control plan. Site grading should be in strict compliance with the requirements of the South Coast Air Quality Management District (SCAQMD) and the Coachella Valley PM10 SIP. Blowing dust and sand during grading operations shall be mitigated by adequate watering of soils prior to and during grading, and limiting the area of dry, exposed and disturbed materials and soils during these activities.	HBFC, Project Contractor	Prior to ground disturbance.
	Less Than Significant	GEO-4 Graded Slopes Unprotected, permanent graded slopes shall not be steeper than 3:1 (horizontal/vertical) to reduce wind and rain erosion. Protected slopes with ground cover may be as steep as 2:1. Fill slopes shall be overfilled and trimmed back to competent material.	HBFC, Project Contractor, Project Geologist	Prior to approval of construction plan set.
	Less Than Significant	GEO-5 Grading Site Drainage Positive site drainage shall be maintained away from the structures (5% for 5 feet minimum) to prevent ponding and subsequent saturation of the foundation soils. Gutters and downspouts should be considered as a means to convey water away from foundations if adequate drainage is not provided. Drainage shall be maintained and no water pond be allowed on or near paved areas.	HBFC, Project Contractor, Project Geologist	During grading/ construction.
	Less Than Significant	GEO-6 Soil Erosion Protection There shall be a cessation of grading activities during rainstorms or high wind events. As necessary, the project contractor shall install flow barriers and soil catchments (such as straw bales, silt fences, and temporary detention basins) during construction to control soil erosion.	HBFC, Project Contractor, Project Geologist	During grading/ construction.

Resource Topic	Level of Impact After Mitigation	Mitigation Measures	Responsible Party/ Monitoring Party	Implementation Timing
Geology and Soils Cont.	Less Than Significant	GEO-7 Recompacting Soils The native sandy soil may be used as engineered fill and utility trench backfill so long as it is free of organic or deleterious matter. The native soil should be placed in maximum 8-inch lifts (loose) and compacted to at least 90% relative compaction (ASTM D 1557) near its optimum moisture content. Compaction should be verified by testing.	HBFC, Project Contractor	During construction.
	Less Than Significant	GEO-8 Imported Soils Imported fill soils (if needed) shall be non-expansive, granular soils meeting the USCS classifications prescribed in the geotechnical report. Import fill soils shall be evaluated by the geotechnical engineer before transported to the project site. Imported fill shall be placed in maximum 8-inch lifts (loose) and compacted to at least 90 percent relative compaction (ASTM D 1557) near optimum moisture content.	HBFC, Project Contractor, Project Geologist	Prior to ground disturbance.
	Less Than Significant	GEO-9 Excavations Excavations shall be made in accordance with CALOSHA requirements. Excavations within sandy soil shall be kept moist, but not saturated, to reduce the potential of caving or sloughing. Where excavations over 4 feet deep are planned, lateral bracing or appropriate cut slopes of 1.5:1 (horizontal:vertical) shall be provided. No surcharge loads from stockpiled soils or construction materials shall be allowed within a horizontal distance measured from the top of the excavation slope and equal to the depth of the excavation.	HBFC, Project Contractor, Project Geologist	During construction.
	Less Than Significant	GEO-10 Soil Corrosivity The site soils contain low concentrations of sulfate and chloride irons that could cause corrosion of concrete and steel. No special provisions for concrete for these low concentrations are required by the CBC and normal concrete mixes shall suffice. However, a minimum concrete cover of three inches shall be provided around steel reinforcing or embedded components exposed to native soil or landscape water. The concrete shall be thoroughly vibrated during placement. The site soils may cause moderate electrochemical corrosion of steel and other metals. Corrosion protection of steel can be achieved by using epoxy corrosion inhibitors, asphalt coatings, cathodic protection, or encapsulating with densely consolidated concrete.	HBFC, Project Contractor, Project Architect and/or Design Engineer	During construction.

Resource Topic	Level of Impact After Mitigation	Mitigation Measures	Responsible Party/ Monitoring Party	Implementation Timing
Geology and Soils	Less Than Significant	GEO-11 Slabs-on-Grade Concrete slabs-on-grade and flatwork shall be supported by compacted soil placed in accordance with measures GEO-7 & 8. Vapor retarder and other slab recommendations regarding slab thickness and reinforcement, control joints, and curing and quality control are provided in the geotechnical report, but are not to be construed as superseding any structural design. The project architect and/or design engineer shall ensure compliance with SB800 with regard to moisture and moisture vapor.	HBFC, Project Contractor, Project Architect and/or Design Engineer	During construction.
	Less Than Significant	GEO-12 Retaining Walls The geotechnical report provided lateral earth pressures for use in retaining wall design, and suggested that a backdrain or an equivalent system of backfill drainage shall be incorporated to ensure that all water is diverted away from the retaining wall. The foundation subgrade shall be prepared in accordance with measures GEO-7 & 8, and compaction on the retained side of the wall shall be performed by hand-operated or other lightweight equipment to reduce potential locked-in lateral pressures caused by heavy grading equipment.	HBFC, Project Contractor	During construction.
	Less Than Significant	GEO-13 Paleontological Monitoring If buried paleontological materials are discovered during any earthmoving operations associated with the Project, all work within 50 feet of the discovery shall be halted or diverted until a qualified paleontologist can evaluate the nature and significance of the finds.	HBFC, Project Contractor	During grading/ construction.
Hazards & Hazardous Materials	Less Than Significant	HAZ-1 Prior to demolition of the HBFC residential halls, an asbestos inspection shall be conducted by a qualified professional in accordance with currently accepted methods and protocols. A comprehensive report of methods, findings, and recommendations shall be provided to the City.	HBFC, Project contractor	Prior to demolition
Hydrology and Water Quality	Less Than Significant	HYD-1 BMPs, as described in the Project-specific WQMP, shall be implemented to ensure that water quality impacts resulting from the Project meet the City's NPDES standards.	HBFC, Project Contractor	Prior to and during construction activities.
	Less Than Significant	HYD-2 The Project shall be subject to NPDES Construction General Permit requirements.	HBFC, Project Contractor	Prior to and during construction activities.

Resource Topic	Level of Impact After Mitigation	Mitigation Measures	Responsible Party/ Monitoring Party	Implementation Timing
Land Use	Less Than Significant	LU-1 <u>Construction Staging</u> Construction activities shall be staged at least 100 feet from residential land uses. Construction activities that have the potential to affect safety, privacy, structures or landscaping, are to be minimized to the greatest degree practicable through standard Best Management Practices.	HBFC, Project Contractor	Prior to finalizing project plans.
Traffic and Circulation	Less Than Significant	CIR-1 The Project proponent shall be responsible for paying the Project's fair-share percentage (0.9%) of costs of a traffic signal at the intersection of Bob Hope Drive & Street A (Intersection #2), as determined in the Project Traffic Impact Analysis prepared by Urban Crossroads, Inc. in February 2020.	HBFC, Project Contractor	Prior to the issuance of grading and/or construction permits.
	Less Than Significant	CIR-2 The Project proponent shall improve Vista Del Sol to its ultimate half-section width as a Local Street (60-foot right-of-way) between the Project's northern and southern boundaries, consistent with the City of Rancho Mirage General Plan Circulation Element. Vista Del Sol shall be improved as required by the final conditions of approval for the Project and applicable City of Rancho Mirage standards.	HBFC, Project Contractor	During construction.
	Less Than Significant	CIR-3 The intersection of Vista Del Sol & Driveway 1 shall be constructed with a stop control on the eastbound approach and the following geometrics: • northbound approach: one shared left-through turn lane • southbound approach: one shared through-right turn lane • eastbound approach: one shared left-right turn lane • westbound approach: not applicable (N/A)	HBFC, Project Contractor	During construction.
	Less Than Significant	CIR-4 Onsite traffic signing and striping shall be implemented in conjunction with detailed construction plans for the Project.	HBFC, Project Contractor	During construction.
	Less Than Significant	CIR-5 Sight distances at each Project access point shall be reviewed with respect to standard Caltrans and City of Rancho Mirage sight distance standards at the time of preparation of final grading, landscape, and street improvement plans.	HBFC, Project Contractor	Prior to finalizing project plans.
	Less Than Significant	CIR-6 The Project shall pay applicable fees in accordance with the Transportation Uniform Mitigation Fee (TUMF) program administered by the Coachella Valley Association of Governments (CVAG).	HBFC, Project Contractor	Prior to the issuance of grading and/or construction permits.

Hazelden Betty Ford Center Preliminary Development Plan Project

DRAFT ENVIRONMENTAL IMPACT REPORT

1.0 INTRODUCTION AND PROJECT DESCRIPTION

Lead Agency

The City of Rancho Mirage (City) is the Lead Agency responsible for the preparation of this Draft Environmental Impact Report (EIR) pursuant to the California Public Resources Code Sections 21000-21189.57, and the 2020 California Environmental Quality Act (CEQA) Guidelines Sections 15000-15387.

CEQA defines "Lead Agency" as the public agency which has the principal responsibility for carrying out or approving a project which may have a significant effect upon the environment (State CEQA Guidelines Section 15367). The proposed action evaluated in this EIR constitutes a "project", as defined by Section 15378 of the State CEQA Guidelines.

The Lead Agency contact person and mailing address regarding this project is: Ben Torres, Associate Planner, City of Rancho Mirage, 69-825 Highway 111, Rancho Mirage, CA 92270. The City phone number is: (760) 328-2266; Email: bent@RanchoMirageCA.gov.

Introduction

The Hazelden Betty Ford Center (HBFC) is owned and operated by the Hazelden Betty Ford Foundation, a leading private non-profit drug and alcohol treatment provider. The HBFC was established in 1982 on the easterly 26.22± acres of the Eisenhower Medical Center (EMC) Campus in Rancho Mirage. The HBFC provides a wide range of treatment protocols, including bio-psycho-social assessments and evaluation, medical detox, residential and outpatient substance abuse treatment, nearby sober living homes, education and support for families and children, and post-rehab continuing care groups. The facility provides residential drug and alcohol treatment, residential rehabilitation programs, and out-patient programs in a supportive and affirming campus environment.

The HBFC opened in 1982 and since that time has taken primary and secondary/emergency access through the EMC campus. The campus and facilities have continued to grow and services have been expanded. Given the age of some of the HBFC buildings and facilities, there is a need to renovate the campus and replace buildings and facilities. Advances in treatment and the need for HBFC to better establish its identity and direct access in the community have also spurred this master planning and rebuilding effort.

Background and Project Summary

The HBFC campus is located within the boundaries of the Eisenhower Medical Center, which also hosts the Barbara Sinatra Children's Center. Development of the EMC campus began in 1969 with the first building opening in 1971. First Lady Betty Ford was instrumental in creating the Betty Ford Center, which became an internationally known treatment facility and was subsequently brought into the family of treatment facilities owned and operated by Hazelden. The proposed Preliminary Development Plan (PDP) Project provides important renovation of HBFC facilities and modestly increases its on-campus capabilities, including new access.

New Residential Buildings

The proposed changes to the HBFC campus set forth in the PDP application include the removal of four residential buildings totaling 51,694± square feet and currently providing a total of 80 beds. These four buildings will be replaced by two 2-story residential buildings, each providing 46 beds for a total of 92 beds. Each will have an overall height of 30± feet. Each level of the new residential buildings will also include a kitchen, community room, office and ancillary space. Each new residential building will encompass 30,935± square feet for a total of 61,870± square feet. These two new residential buildings will be located on the west end of the HBFC campus, with the southerly residential building to be located approximately 260 feet north of the closest residence within the Wilshire Palms condominium development to the south. The northerly residential building will be located approximately 870 feet south of the closest residence in the Rancho Mirage Country Club subdivision to the north (see Exhibits I-6A & I-6B).

New Day-Treatment Building

The Project also includes the construction of a new one-story, 22,748± square foot day-treatment building to be located on a currently vacant and undeveloped portion of the campus immediately west of Vista Del Sol. This building will be located approximately 100 feet west of the east HBFC property line. It will house 44 day-treatment beds, support space, and 6,400 square feet of administrative space, including computer lab and lecture hall.

Vista Del Sol Access Drive

The proposed Project includes the development of a new primary access onto the HBFC campus from the adjoining Vista Del Sol. Bounding the subject property on the east, this roadway extends south to a signalized intersection at Country Club Drive, and north to a stop-controlled intersection at Frank Sinatra Drive. A new access drive of approximately 24-30 feet wide is planned, which will proceed west into the campus and connect to the existing on-site circulation network. Appropriate signage is also proposed at this location.

Ancillary Site Modifications

In addition to removing four existing buildings and constructing three new ones, the Project also proposes limited modifications to the existing site plan. In addition to new and modified on-site stormwater retention ponds, the new site plan adds a labyrinth and updated gardens and open space areas, with an increased emphasis on desert and drought-tolerant landscaping. Several small outbuildings, including mechanical equipment and smoking pavilions, are also planned.

1.1 Project Location and Limits

The Project site is located in the south ½ of Section 6, Township 5 South, Range 6 East, San Bernardino Baseline and Meridian. Vista Del Sol is a local north-south street bounding the subject property on the east. Lands to the north and west are part of the Eisenhower Medical Center (EMC) campus, which extends west to Bob Hope Drive. Portions of the EMC campus also extend south to Country Club Drive, including John Sinn Road from which the HBFC currently takes primary access (see Exhibit 1-5). The subject and surrounding lands are shown on the United States Geological Survey (USGS) 7.5-minute Cathedral City, California quadrangle. Also, please see Exhibits 1-1: Regional Location Map, 1-2: Area Location Map, 1-3: Project Vicinity and 1-4: Project Planning Area. Assessor's Parcels involved include 685-270-017 and 685-280-017, 016 and 028.

1.2 Purpose and Need

The purpose of the proposed Project is to renovate and modernize the facilities and grounds of the existing HBFC campus, and to allow for the addition of resident beds and other buildings and facilities. Since its inception in 1982, the HBFC has seen a continued growth in demand for quality treatment programs and facilities. The proposed Project will allow the HBFC to update and modernize its residential and treatment facilities, and expand its capabilities at the campus. The Project also provides alternative and less circuitous access that allows patients to reach the HBFC campus without traveling through the EMC campus. The proposed Project will also allow the applicant to expand sustainable design principles that reduce energy use and expand opportunities for the use of renewable resources, and to reduce on-campus water use by renovating the campus landscape with desert/drought-tolerant plantings.

1.3 Statement of Project Objectives

CEQA Guidelines Section 15126.6 states that an EIR must describe and evaluate a reasonable range of alternatives to a project that would feasibly attain most of the project's basic objectives, but that would avoid or substantially lessen any identified significant adverse environmental effects of the project. The EIR should also evaluate the comparative merits of the project. Specifically, Section 15126.6 sets forth criteria for selecting and evaluating alternatives. The Draft EIR supports a determination of No Significant Impacts from implementation of the proposed Project with the implementation of mitigation measures set forth in this EIR.

Pursuant to CEQA Guidelines Section 15124(b), the project description includes a statement of objectives. The purpose of the objectives is to assist the HBFC in developing a reasonable range of project alternatives to evaluate in this EIR. These objectives are intended to explain the purpose of the project, and to aid the decision-makers in preparing findings or a statement of overriding considerations, if necessary.

The project objectives identify the purpose of the Project. HBFC has identified the following list of criteria as the objectives for the Project.

- Complete a comprehensive update to the Hazelden Betty Ford Center campus master site plan
- Replace older and outdated residential treatment buildings with modern, more efficient facilities
- Broadened capabilities including a new stand-alone day-treatment facility
- New primary access from Vista Del Sol with appropriate entry and arrival statement
- Renovated site landscaping with increased use of desert and drought-tolerant landscape materials
- Integrated renewable energy systems that reduce reliance on SCE grid sources
- Enhance the Center's ability to meet the changing regimens for treating patients with a substance use disorder

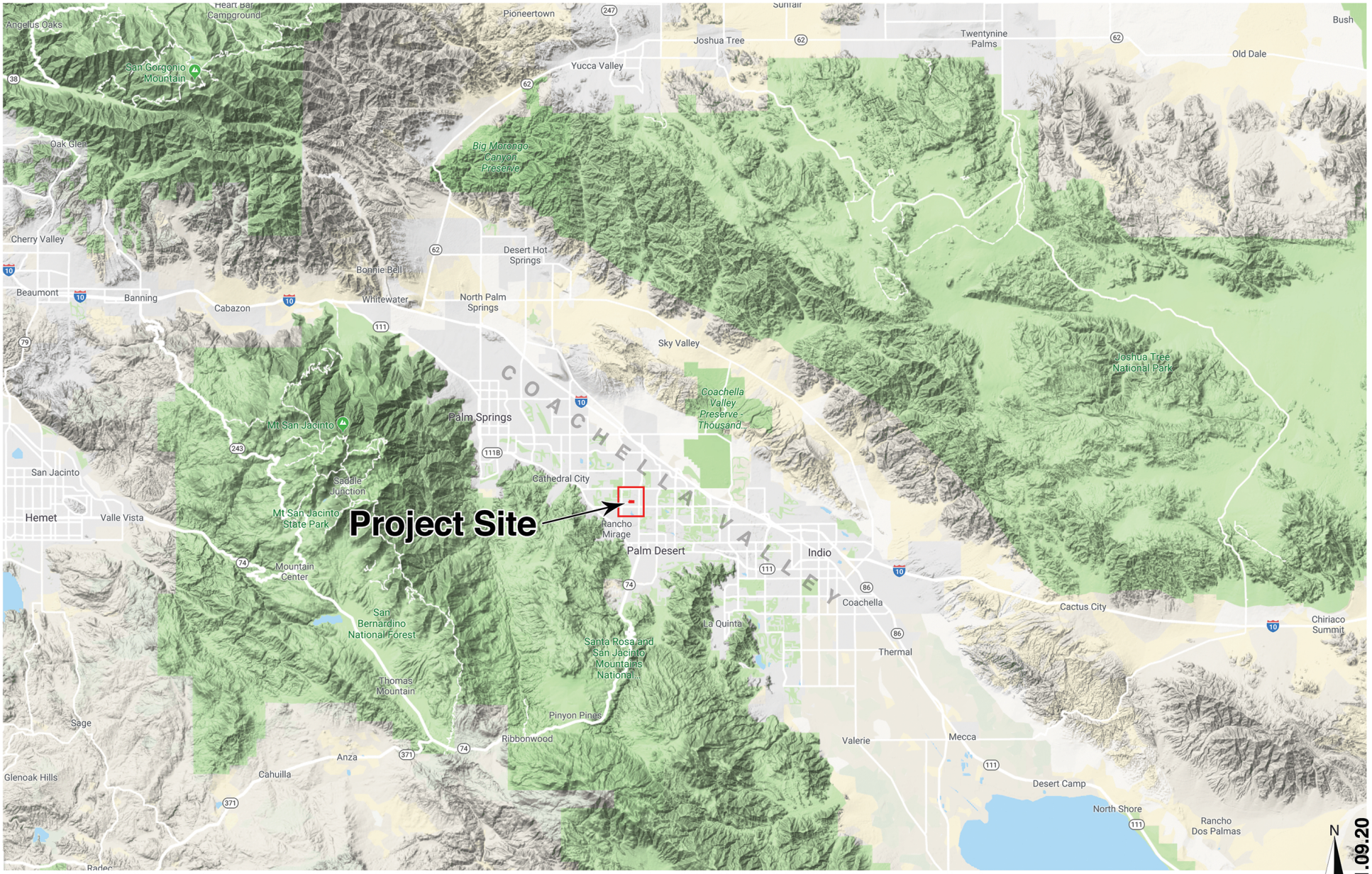


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Hazelden Betty Ford Center PDP EIR
Area Location Map
Rancho Mirage, California

Hazelden Betty Ford Foundation

Exhibit
1-1



Source: Google Maps, 2019

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Hazelden Betty Ford Center PDP EIR
Area Location Map
Rancho Mirage, California

Hazelden Betty Ford Foundation

Exhibit
1-2



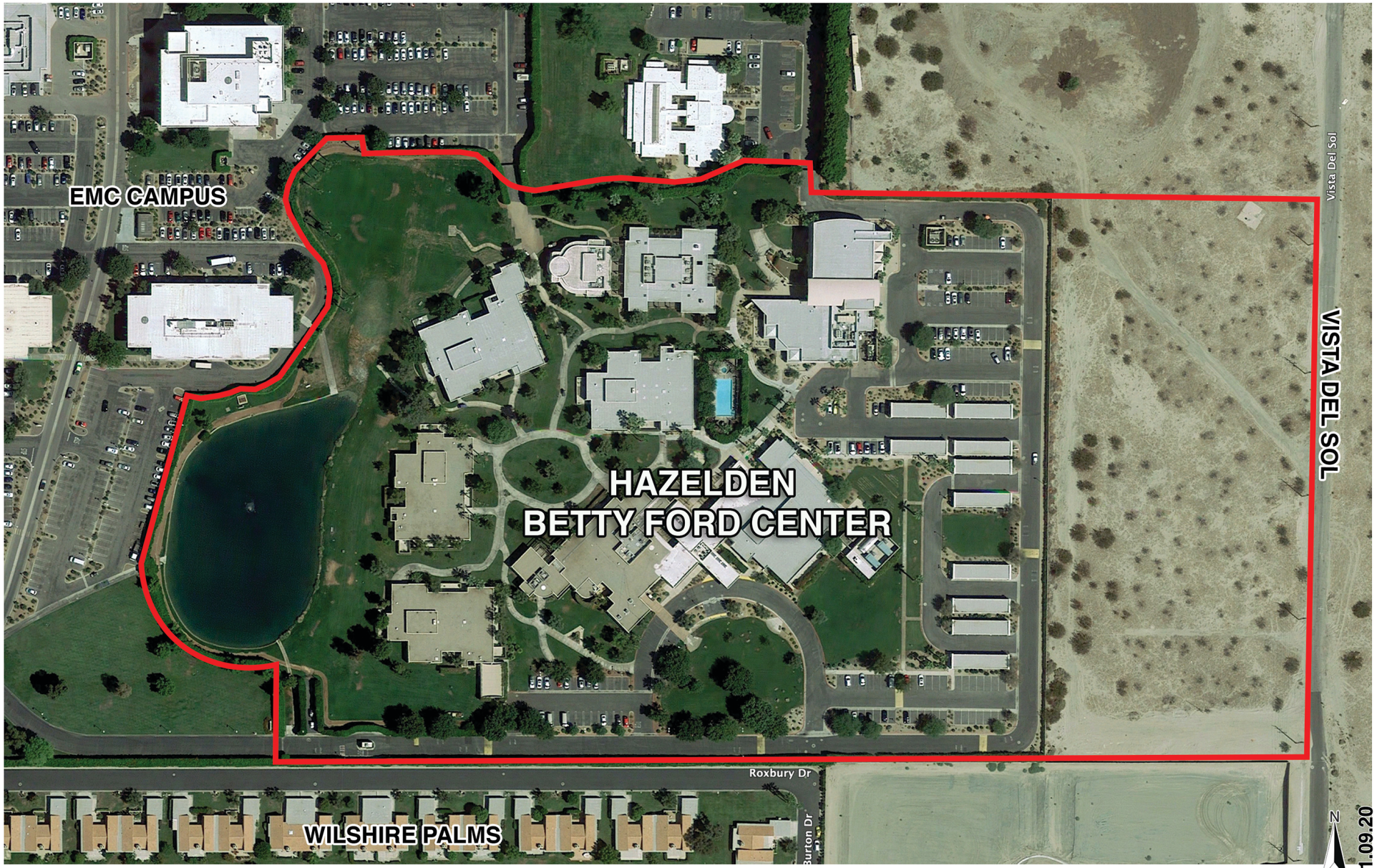
Source: Google Earth, 2018

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Hazelden Betty Ford Center PDP EIR
Vicinity Map
Rancho Mirage, California

Hazelden Betty Ford Foundation

Exhibit
1-3



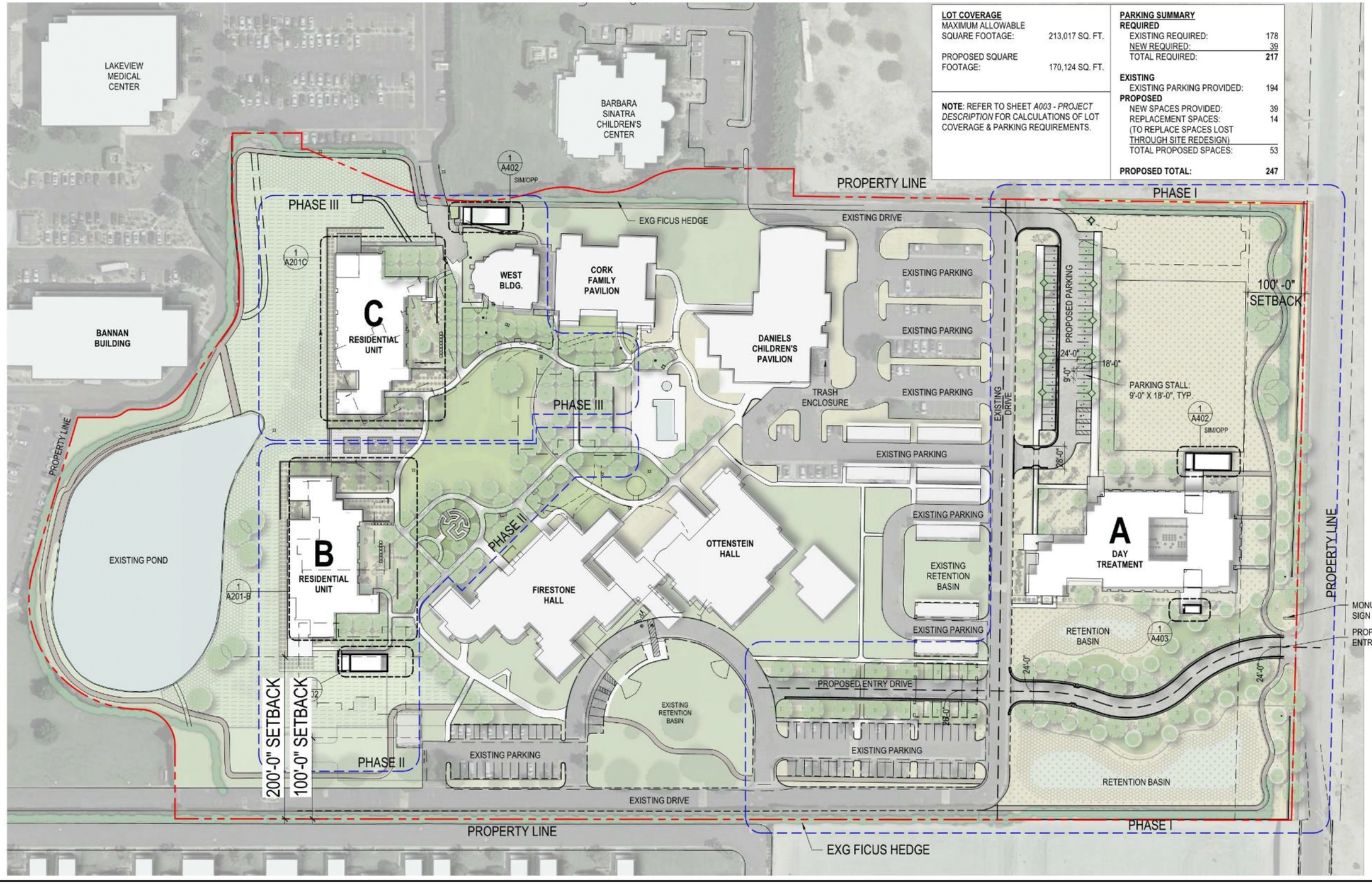
Source: Google Earth, 2019

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Hazelden Betty Ford Center PDP EIR
Project Planning Area
Rancho Mirage, California

Hazelden Betty Ford Foundation

Exhibit
1-4



LOT COVERAGE

MAXIMUM ALLOWABLE SQUARE FOOTAGE:	213,017 SQ. FT.
PROPOSED SQUARE FOOTAGE:	170,124 SQ. FT.

NOTE: REFER TO SHEET *A003 - PROJECT DESCRIPTION* FOR CALCULATIONS OF LOT COVERAGE & PARKING REQUIREMENTS.

PARKING SUMMARY

REQUIRED	
EXISTING REQUIRED:	178
NEW REQUIRED:	39
TOTAL REQUIRED:	**217**
EXISTING	
EXISTING PARKING PROVIDED:	194
PROPOSED	
NEW SPACES PROVIDED:	39
REPLACEMENT SPACES: (TO REPLACE SPACES LOST THROUGH SITE REDESIGN)	14
TOTAL PROPOSED SPACES:	53
PROPOSED TOTAL:	**247**

Source: HGA Architects, 3.16.20

N

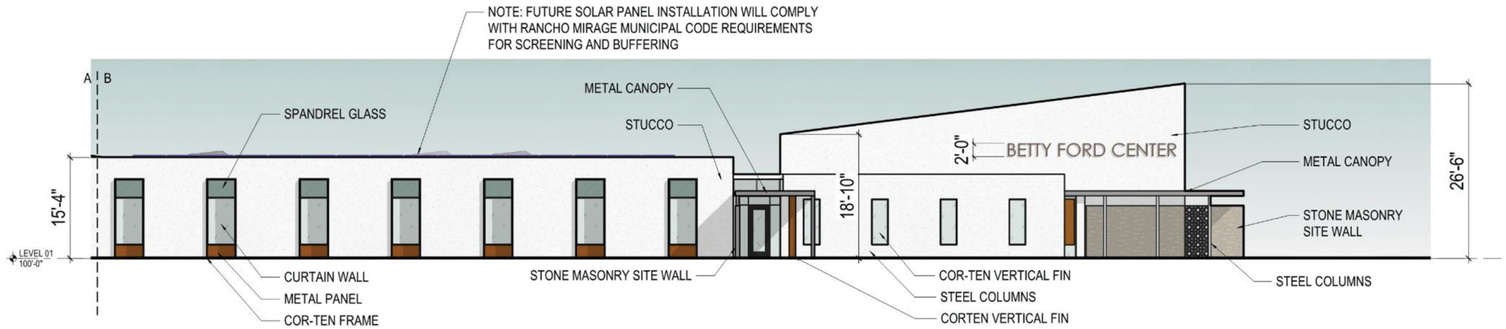
04.07.20

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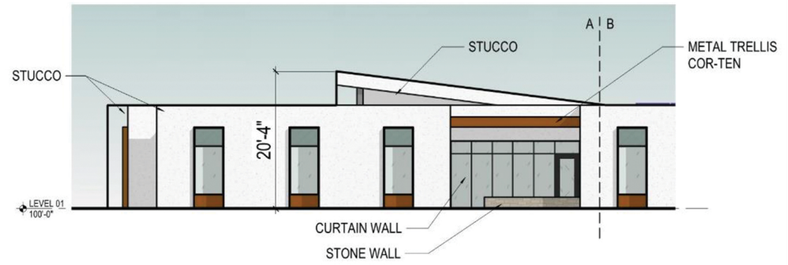
Hazelden Betty Ford Center PDP EIR
Proposed Project Master Site Plan
Rancho Mirage, California

Hazelden Betty Ford Foundation

Exhibit
1-5



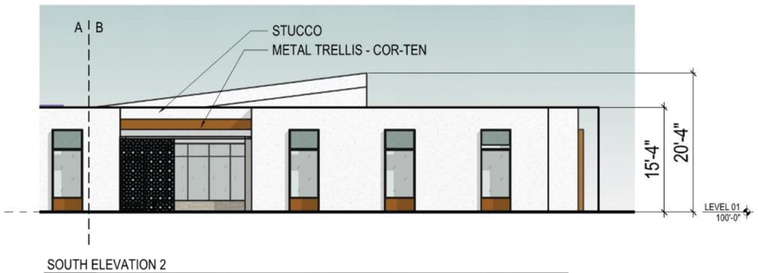
NORTH ELEVATION 1



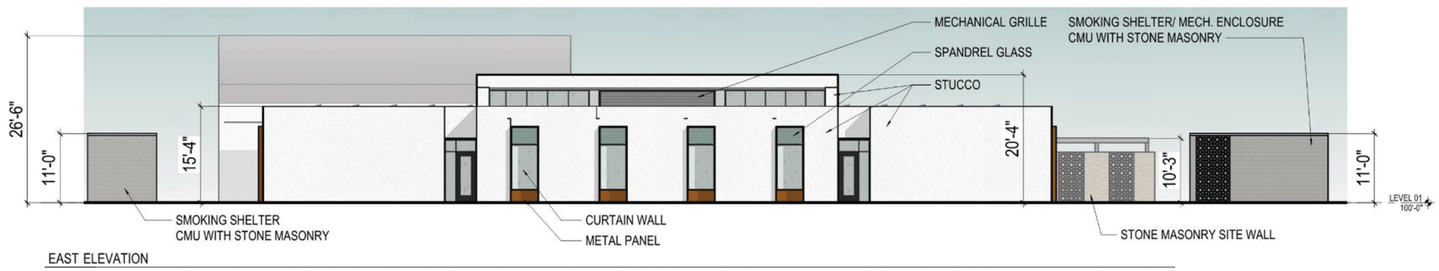
NORTH ELEVATION 2



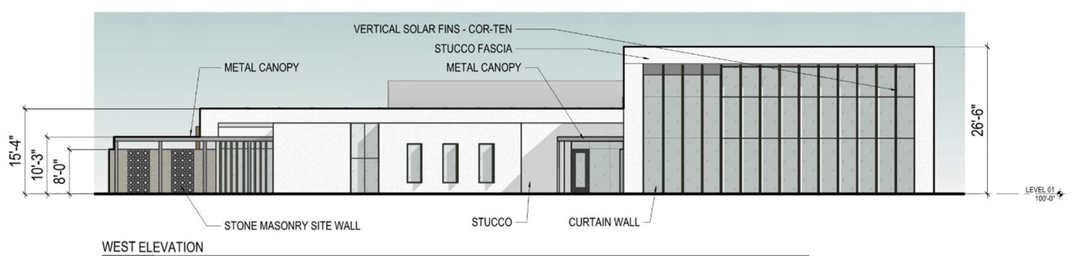
SOUTH ELEVATION 1



SOUTH ELEVATION 2



EAST ELEVATION



WEST ELEVATION

Source: HGA Architects, 3.16.20

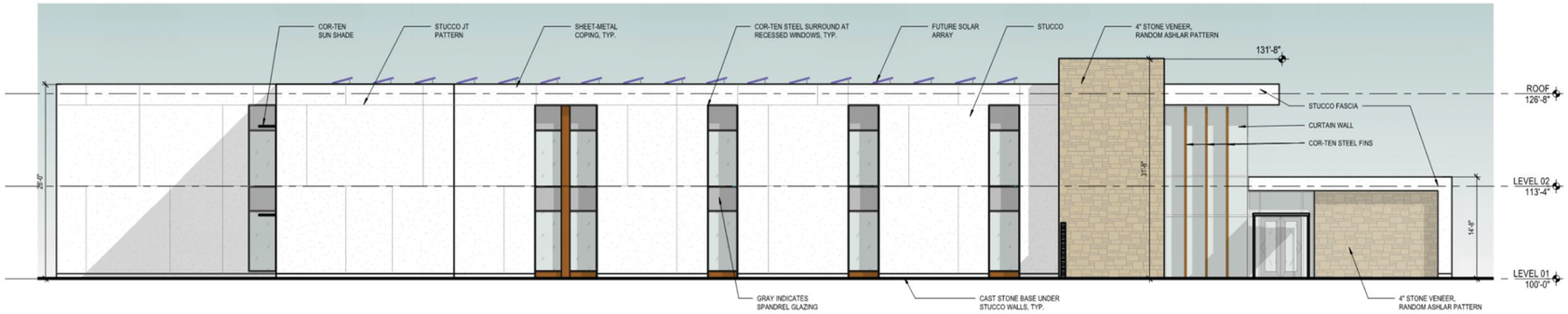
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Hazelden Betty Ford Center PDP EIR
Elevations - Day Treatment Buildings
Rancho Mirage, California

Hazelden Betty Ford Foundation

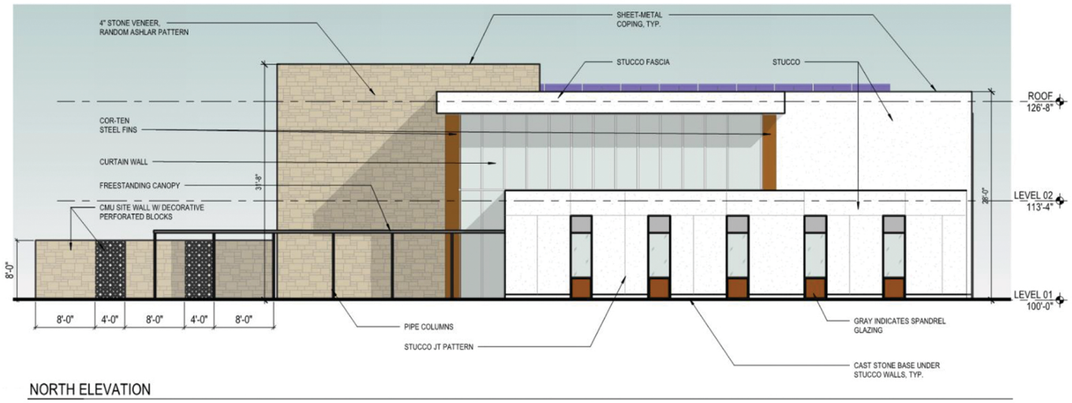
Exhibit
1-6A



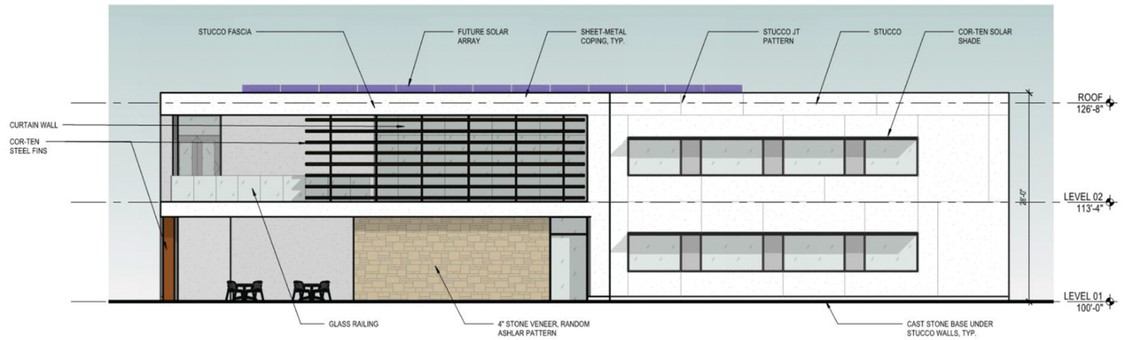
EAST ELEVATION



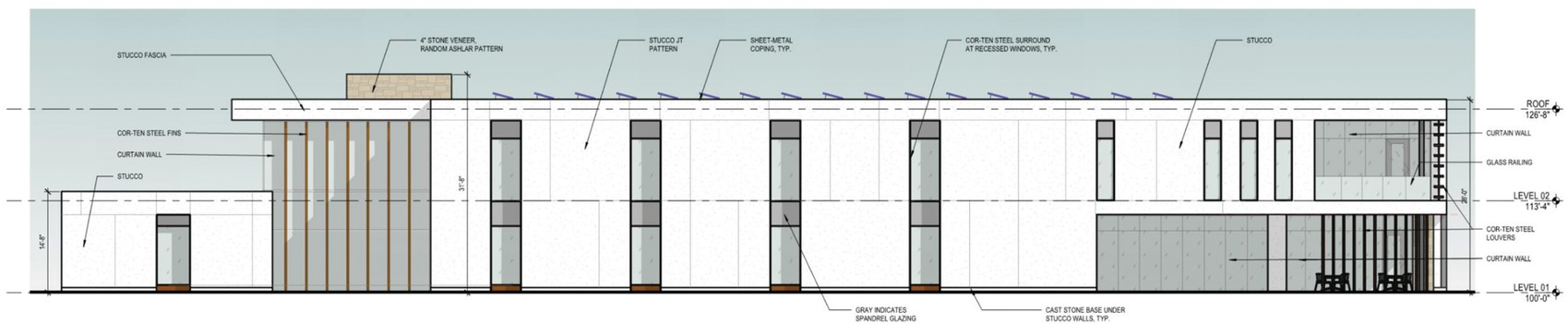
STAIR B ELEVATION



NORTH ELEVATION



SOUTH ELEVATION



WEST ELEVATION

Source: HGA, 2019

N

01.30.20

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PLANNING & RESEARCH, INC.

Hazelden Betty Ford Center PDP EIR
Elevations - Residential Buildings
Rancho Mirage, California

Hazelden Betty Ford Foundation

Exhibit
1-6B

Table 1-1 Hazelden Betty Ford Center
Preliminary Development Plan Development Data (Proposed Project)

Building Name	Existing No. of Beds	Proposed No. of Beds	Sq. Ft. Existing	Current Proposed Sq. Ft.	(+/-)	Functional Use	Parking Rate	Existing Prkg. Provided	New Prkg. Spaces Rqrd.	Notes
Fisher Hall	20		12,818	0	(12,818)	Special Treatment	0.2 / Bed	4	(4)	Existing Building to be Demolished
Pocklington Hall	20		12,894	0	(12,894)	Special Treatment	0.2 / Bed	4	(4)	Existing Building to be Demolished
McCallum Hall	20		12,988	0	(12,988)	Special Treatment	0.2 / Bed	4	(4)	Existing Building to be Demolished
North Hall	20		12,994	0	(12,994)	Special Treatment	0.2 / Bed	4	(4)	Existing Building to be Demolished
Cork Family Pavilion	-		11,968	11,968	-	Accessory Use	N.A.	-	-	
Firestone Hall	-		17,662	17,662	-	General Office	4.0 / 1000 SF	71	0	
Residential Bldg. #1	**-**	**46**	**-**	**30,935**	**30,935**	**Special Treatment**	**0.2 / Bed**		**10**	**New Bldg. to Replace Existing Bldgs.**
Residential Bldg. #2	**-**	**46**	**-**	**30,935**	**30,935**	**Special Treatment**	**0.2 / Bed**		**10**	**New Bldg. to Replace Existing Bldgs.**
Daniels Building	-						4.0 / 1000 SF			
Office Spaces			25,606	25,606-	-	General Office	4.0 / 1000 SF	103	0	
Conference Rooms			10,975	10,975-	-	Accessory Use	N.A.			
Ottenstein Hall	20	20	14,700	14,700	-	Special Treatment	0.2 / Bed	4	0	
West Building			4,595	4,595		Accessory Use	N.A.			
Day Treatment Bldg.										**New Building**
Admin. Space				**5,975**	**5,975**	**General Office**	**4.0 / 1000 SF**		**26**	
Functions		**44**		**17,103**	**17,103**	**Special Treatment**	**0.2 / Bed**		**9**	
Totals	**100**	**156**	**137,200**	**170,454**	**33,676**			**194**	**39**	Project Needs to Provide 39 Parking Spaces + Spaces Removed
									14	Number of Existing Parking Spaces Lost through Site Redesign
									53	Total New Parking Spaces to Provided
									247	**Total Number of Parking Spaces Provided**

1.4 CEQA Process

California Environmental Quality Act

In accordance with Sections 15063, 15064 and 15065 of the State CEQA Guidelines, the City prepared an Initial Study (2019) to identify potentially significant impacts associated with the proposed HBFC PDP Project. Based on the preliminary assessment, the City determined that an EIR should be prepared to evaluate the potential environmental effects associated with the implementation of the Project (refer to Appendix A).

The EIR has been prepared in accordance with CEQA (as amended), pursuant to State CEQA Guidelines §15121 (Informational Document) and the City's Rules to Implement CEQA:

- *An EIR is an informational document which will inform public agency decision makers and the public generally of the significant environmental effects of a project, identify possible ways to minimize the significant effects, and describe reasonable alternatives to the project. The public agency shall consider the information in the EIR along with other information which may be presented to the agency.*
- *While the information in the EIR does not control the agency's ultimate discretion on the project, the agency must respond to each significant effect identified in the EIR by making findings under Section 15091 and if necessary by making a statement of overriding consideration under Section 15093.*
- *The information in an EIR may constitute substantial evidence in the record to support the agency's action on the project if its decision is later challenged in court.*

1.4.1 Notice of Preparation and Public Scoping Meeting

The process of determining the appropriate scope, focus, and content of an EIR is known as "scoping" (Public Resources Code 21083.9 and CEQA Guidelines Section 15082). The first step in the scoping process is conducting a preliminary assessment of the project and the issuance of a Notice of Preparation (NOP) of an Environmental Impact Report to solicit input from agencies and other parties of interest, including the general public.

The NOP was released on December 16, 2019, and the 30-day public review period concluded on January 16, 2020. A public scoping meeting was held at Rancho Mirage City Hall on January 8, 2020 from 2:00 to 4:00 p.m. and served the purpose of educating and informing the public about the proposed PDP Project, addressing public questions and concerns, and collecting input on the CEQA process. The first part of the scoping meeting included a 5-minute Power Point presentation followed by an open house format where the public was able to review project exhibits and discuss the environmental review process with project team members. Comment cards and note pads were also used to record comments and questions raised by attendees. One member of the public attended the public scoping meeting (see Scoping Meeting report in Appendix A) and voiced general support for the proposed Project. Beyond a second-hand conveyance of property owners concerns regarding future traffic on Vista Del Sol, no other specific areas of concern were identified through the formal CEQA public scoping process.

In addition to the public scoping meeting, the applicant held a Neighborhood Scoping Meeting on the HBFC campus from 6:00 p.m. to 8:00 p.m. on October 29, 2019. Issues raised by attendees included traffic and traffic control along Vista Del Sol, campus security, land use compatibility, and building heights and visibility. Comments from the neighborhood meeting and the City Public Scoping Meeting are addressed in this Draft EIR.

The NOP (see Appendix A) was submitted to the Riverside County Clerk for 30-day posting. The NOP was also submitted to the State of California Governor's Office of Planning and Research, State Clearinghouse (SCH), which circulated the NOP to state agencies for a 30-day review and comment period. A public notice was also published in a newspaper of local circulation. Nine (9) comment letters were received from the following: South Coast Air Quality Management District (SCAQMD), Native American Heritage Commission, California Department of Fish and Wildlife, Coachella Valley Water District, Dr. Peter Tynberg, Desert Sands Unified School District, SunLine Transit Authority, Twenty-nine Palms Band of Mission Indians, and the State Clearinghouse (see Appendix A).

In general, comments were regarding proper coordination with local Native American tribes, conformance with the Coachella Valley Multiple Species Habitat Conservation Plan and any other applicable resource protection plans and regulations, potential impacts to school facilities/capacity, compliance with local and regional air quality regulations and standards, and access to public transit. Commentators also requested that further detail be provided in the forthcoming EIR, and immediate responses were not required. The nine agencies/districts/parties who provided comments will receive proper notification and Draft EIR materials to review during the public comment period process.

1.4.2 Draft EIR

This Draft EIR is being circulated along with the Notice of Availability and Notice of Completion for public review for a 45-day review period, in accordance with State CEQA Guidelines Section 15085.

1.4.3 Final EIR

Following the public review and comment period, the City will prepare written responses to the written comments received on the Draft EIR. Where necessary, the Draft EIR may be revised, as appropriate, and together with the Response to Comments, will constitute the Final EIR. In accordance with State CEQA Guidelines Sections15090-15097, the Rancho Mirage City Council will be the final authority certifying the Final EIR during a noticed public hearing.

Following Final EIR certification, the City may proceed with consideration of proposed PDP application Project approval action. CEQA also requires the adoption of findings prior to approval of a project where a certified Final EIR identifies significant unmitigated environmental effects that would be caused by implementation of a project.

If the project that is approved would result in significant unmitigated effects that are identified in the Final EIR and that cannot be avoided or substantially lessened, the City shall so state in writing in a "statement of overriding considerations" the specific reasons to support its action based on the Final EIR and/or other information in the record. If the project is approved, the City would file a Notice of Determination (NOD) with the County Clerk and State Clearinghouse within five working days following project approval.

1.4.4 Mitigation Monitoring and Reporting

CEQA requires lead agencies to adopt a Mitigation Monitoring and Reporting Program (MMRP) at the same time the Final EIR is certified. The MMRP is a verification tool for use by the Lead Agency that lists the mitigation program task, entity responsible for implementation, timing of compliance, and record of date of compliance. Once the Final EIR and MMRP are certified, the mitigation measures become conditions of the project.

1.4.5 Organization of the Draft EIR

The organization of the Draft EIR is as follows:

Environmental Matrix - Summary of Project, Impacts and Mitigation

Section 1 – Introduction and Project Description. The section includes a description of the proposed Project and summarizes construction and operational characteristics of the proposed Project. Areas of controversy are also identified. This section describes the CEQA process and the organization of this document.

Section 2 – Environmental Setting, Impacts and Mitigation Measures. The environmental setting discussion provides important background data and information on all CEQA analysis categories on a regional and area-wide basis. This section of the EIR serves to establish the physical context within which the Project is being considered

and analyzed. It also presents the physical and regulatory setting by environmental resource category, identifies impact significance criteria, and analyzes potential impacts of the Project, including potential cumulative impacts. Mitigation measures and monitoring and reporting programs are identified, where applicable. Section 2 analyzes the following resource areas:

- Introduction (Section 2.1)
- Summary of Environmental Impact Analysis (Section 2.2)
- Aesthetics (Section 2.3)
- Air Quality (Section 2.4)
- Biological Resources (Section 2.5)
- Cultural and Tribal Cultural Resources (Section 2.6)
- Geology and Soils (Section 2.7)
- Greenhouse Gas Emissions (Section 2.8)
- Hazards and Hazardous Materials (Section 2.9)
- Hydrology and Water Quality (Section 2.10)
- Land Use and Planning (Section 2.11)
- Mineral and Energy Resources (Section 2.12)
- Noise (Section 2.13)
- Population, Housing and Socio-Economic Resources (Section 2.14)
- Public Services (Section 2.15)
- Transportation and Traffic (Section 2.16)
- Utilities and Service Systems (Section 2.17)

Impact Categories Not Further Analysed
The Initial Study prepared for the Notice of Preparation and this EIR[1] evaluated each of the analysis categories set forth in Appendix G of the CEQA Guidelines. Three CEQA analysis categories were determined to be not be impacted or not significantly impacted by development of the proposed Project. These include *Agricultural and Forest Resources, Recreational Resources* and *Wildfire*. There are no agricultural or forest lands or related resources in the Project vicinity. The Project will have no effect on community recreational resources and the area lies well outside any identified wildfire hazard zone.

Section 3 – Project Alternatives Analysis. This section describes alternatives to the proposed Project that have the potential to further reduce significant impacts associated with the proposed Project and compares their impacts to those of the Project. This section also identifies which alternative is environmentally superior on a categorical basis and overall.

Section 4 – Unavoidable Significant Impacts. This section discusses significant environmental effects that cannot be avoided if the Project is implemented, and significant irreversible environmental changes associated with the Project. This section also provides a summary of any significant unavoidable cumulative impacts that are discussed in the resource sections.

Section 5 – Irreversible and Irretrievable Commitment of Resources. This section evaluates the Project's effects on natural resources, including energy and water, and the level of commitment of these resources associated with the Project.

Section 6 – Growth Inducing Impacts. This section discusses the Project's potential to induce growth both locally and regionally.

[1] See Appendix A of this Draft EIR.

Section 7 – Organizations, Persons and Documents Consulted. This section describes and lists the various parties, agencies, documents and other resources used in preparing the subject EIR.

Technical Appendices - provide information in support of the above sections and are identified in the Table of Contents.

1.5 Responsible Agencies

Under CEQA, provision is made for state agencies to act as "Responsible Agencies." Per California Public Resources Code Section 21069, a "Responsible Agency" is a public agency, other than the Lead Agency, which has responsibility for carrying out or approving a project. The authority of responsible agencies that may have responsibility for carrying out or approving a project and for complying with CEQA is limited to that part of the project that they will be called upon to carry out or approve (Public Resources Code Sections 21140(c), 21153(c); CEQA Guidelines Sections 15041(b), 15042).

1.6 Project's Relationship to Other Plans

Regional Plans
The proposed Project is related to or must accommodate other plans developed in the City and Coachella Valley. These include the Coachella Valley Multiple Species Habitat Conservation Plan (CVMSHCP), the South Coast Air Quality Management District (AQMD) Air Quality Management Plan, and the Coachella Valley PM10 State Implementation Plan.

Local Plans
Local plans taken into consideration include the Rancho Mirage General Plan and the Eisenhower Medical Center (EMC) Specific Plan. The existing and proposed use on the subject property is consistent with existing development and the type and scale of development allowed under the City General Plan and the EMC Specific Plan.

1.7 Permits, Approvals, Easements

The City is the CEQA Lead Agency and is empowered with regulating land use and other activities within its corporate boundaries. The subject PDP Project is a discretionary permitting process that culminates in the processing and approval of a conforming final development plan. The subject EIR is also used by the City and may be used by others to authorize the issuance of roadway encroachment permits, demolition permits, grading and building permits, and other authorizations.

Hazelden Betty Ford Center Preliminary Development Plan Project

DRAFT ENVIRONMENTAL IMPACT REPORT

2. ENVIRONMENTAL IMPACTS AND MITIGATION MEASAURES

2.1 Introduction

This section of the EIR provides an overview of the regional environmental setting in which the proposed HBFC PDP Project is located, the impacts resulting from the implementation of the Project, and the mitigation measures required to reduce these impacts to less than significant levels. As prescribed by CEQA, the analysis is conducted on a categorical basis. Each discussion includes a description of the thresholds of significance considered in the analysis, regulatory framework, environmental setting, and existing conditions in the Project area. These discussions are followed by an analysis of the impacts of the proposed Project, including a determination of the level of impact (less than significant, less than significant with the implementation of mitigation measures, or significant and unavoidable). Mitigation measures are provided where necessary to reduce impacts to the greatest extent possible. Where feasible mitigation measures are not possible, or where the feasible mitigation measures do not reduce the impacts of the Project to less than significant levels, the impact is determined to be significant and unavoidable.

2.2 Summary of Environmental Impact Analysis

The following resource topics are assessed for potential impacts associated with the proposed Project:

- Aesthetics in Section 2.3
- Air Quality in Section 2.4
- Biological Resources in Section 2.5
- Cultural and Tribal Cultural Resources in Section 2.6
- Geology and Soils in Section 2.7
- Greenhouse Gas Emissions in Section 2.8
- Hazards and Hazardous Materials in Section 2.9
- Hydrology and Water Resources in Section 2.10

- Land Use and Planning in Section 2.11
- Energy and Minerals 2.12
- Noise in Section 2.13
- Population and Housing in Section 2.14
- Public Services in Section 2.15
- Transportation in Section 2.16
- Utilities and Service Systems in Section 2.17

Two resource topics were determined to have "No Impact" as they relate to the proposed Project, and are not further discussed in this DEIR:

- Agricultural and Forestry Resources: The Project site is within the urban core of the City, and contains neither of these resources. Nor is there any zoning for such resources in the City.
- Wildfire: The Project site is located within the urban core of the City, and does not contain wildlands. The City occurs in an arid desert environment, and does not contain forested areas subject to wildfire.

Threshold of Significance: This subsection identifies the CEQA thresholds that are applicable to the resource topic and the Project.

Regulatory Framework: This subsection provides a brief discussion of federal, State, and local regulations and policies that are applicable to the resource topic and the Project.

Environmental Setting: This subsection provides an overview of the regional environmental setting in which the proposed Project is located, with particular emphasis on the environmental constraints and resources most likely to be affected by implementation of the Project.

Existing Conditions: This subsection presents a description of the existing physical environmental conditions at and in the immediate vicinity of the Project site with respect to each resource area, at an appropriate level of detail to understand the impact analysis.

Impacts and Mitigation Measures: This subsection analyzes the specific impacts of the proposed Project on each question provided in Appendix G of the CEQA Guidelines, as amended in 2019. Where necessary, mitigation measures are included to reduce identified significant impacts to less than significant levels to the greatest extent possible.

Cumulative Impacts: This subsection addresses the proposed Project's cumulative impacts, when considered with General Plan build out or other factors identified for each resource area.

2.3 Aesthetics

2.3.1 Introduction

Existing aesthetic resources in the planning area, vicinity and the region are described in this section. Aesthetic resources include scenic vistas, scenic resources, the visual character of the areas surrounding the proposed alternatives, and the impacts that light and glare from the alternatives will have on surrounding areas. Potential impacts on visual resources from implementation of the HBFC PDP Project are assessed and mitigation measures are set forth to reduce potential impacts where appropriate. Existing conditions have been assessed and are described, as are potential effects associated with the proposed Project and from other future development that is expected to occur in the vicinity.

The visual setting is characterized by the natural and built landscape features that may be viewed from publicly accessible vantage points. For analysis purposes, scenic resources are categorized as the built or natural environment that contributes to a scenic public setting. This includes but is not limited to trees and rock outcroppings. Scenic vistas are considered any publicly accessible viewpoints that provide expansive views of a highly valued landscape view.

The California Environmental Quality Act (CEQA) prescribes how jurisdictions must address issues related to visual/scenic resources.

2.3.2 Thresholds of Significance

Based on Appendix G of the 2020 State CEQA Guidelines, impacts related to aesthetics would be significant if the proposed Project would:

a) Have a substantial adverse effect on a scenic vista?

b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

d) Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?

2.3.3 Regulatory Framework

Federal

The proposed Project is not subject to the National Environmental Policy Act (NEPA) or to the provisions of NEPA as implemented by any federal or state agency. Therefore, there are no federal regulations that are relevant to the proposed Project.

State

In 1963, the State of California established the Scenic Highway Program to develop a system of State roadways whose adjacent corridors contained scenic resources worthy of protection and enhancement. Sections 260 through 263 of the State Streets and Highways Code establish the Scenic Highways Program and require local government agencies to take the following actions to protect the scenic appearance of a scenic corridor:

- Regulate land use and density of development,
- Provide detailed land and site planning,
- Prohibit off-site outdoor advertising and control on-site outdoor advertising,
- Pay careful attention to and control earthmoving and landscaping, and
- Scrutinize the design and appearance of structures and equipment.

The proposed Project is not located near any road segment designated a State Scenic Highway or eligible for such designation, and is not subject to the provisions of the state's Scenic Highway Program.

Regional/Local

No regional regulations regarding aesthetics are applicable to the proposed Project. The proposed Project is not located near any road segment designated a State Scenic Highway. Applicable City policies and programs (Rancho Mirage General Plan 2017) include the following:

Program CD 3.3A: Where practical, widen parkways for view preservation, enhanced landscaping, and to minimize the visual impact of perimeter walls.

Program CD 3.3B: Expand the design review process to require an analysis of the visual impacts of rooflines of the homes abutting the perimeter walls along arterial roadways and reduce their visual impacts through:
- Increased backyard setbacks for homes that abut major roadways
- Requiring that roofs of adjacent homes be of a different style
- Encouraging low-profile roof designs such as shallow-pitched hipped roofs
- Requiring architectural elevations of all sides of proposed structures
- Requiring upgraded elevations for houses that flank the entries of gated communities, and which are visible from public streets

Program CD 3.3C: Underground utilities whenever possible and adopt lighting standards that create the minimum visual impact without compromising safety.

Policy CD 5.1: Wall and fence designs shall be considered important components of the design review process and overall streetscape improvement plans.

2.3.4 Environmental Setting

The Coachella Valley and the proposed Project area are distinguished by the low-lying desert valley floor surrounded by the high terrain of the San Jacinto, San Bernardino, Little San Bernardino, and Santa Rosa Mountains. These contrasting viewsheds result in an exceptional display of open space and mountain scenery that is a major component of the aesthetic quality of the area. The mountainous areas that ring the Coachella Valley are comprised of a variety of rock formations including darkly varnished rock that contrasts with large expanses of light gray granite, and a diversity of vegetation. Views of the mountain ranges and the limited expanses of desert floor that are visible within the project planning area are highly valued.

The two highest peaks associated with the region are San Jacinto Peak in the San Jacinto Mountains located to the northwest and rising to an elevation of 10,804 feet, and San Gorgonio Peak in the San Bernardino Mountains with an elevation of 11,502 feet. The rise of Mt. San Jacinto, from the desert floor to the peak, is the steepest gradient in North America. The Santa Rosa Mountains are located south and southwest of the Project area, with highest peaks being Toro Peak at 8,717 and Santa Rosa Peak at about 8,000 feet.

To the north and northeast of the subject property are the Indio Hills, with elevations rising to about 1,600 feet, and beyond the Little San Bernardino Mountains bounding the valley to the northeast. The valley is also a result of tectonic forces associated with the San Andreas Fault Zone. The Coachella Valley is the northwestern extension of a fault-controlled spreading zone, which extends from the Gulf of California. The Project site is surrounded by natural vistas including the surrounding mountains and areas of native desert lands.

2.3.5 Existing Conditions

The Coachella Valley is a low desert basin surrounded by dramatic mountainous terrain created by the active geology that is characteristic of Southern California. The overall gradient of the Valley is from northwest to southeast, gently sloping from the San Gorgonio Pass, at approximately 2,600 feet above mean sea, level to the Salton Sea, which has an average 2018 surface elevation of approximately 236 feet below mean sea level.

The valley is located within the Salton Trough, a fault-controlled valley formed by the San Andreas Fault Zone. The Salton Trough is located within the Colorado Desert Geomorphic Province, which is bounded to the southwest by the Peninsular Ranges province, to the north by the eastern Transverse Ranges province, and to the northeast by the southeastern portion of the Mojave Desert province. The surrounding provinces contain some of the highest mountain peaks in the state and the region.

Concepts and Terminology

The following section describes the terms used in this aesthetics evaluation. For analysis purposes, a variety of viewshed have been selected in for analysis to determine the potential effects of the proposed Project on the local aesthetic resources and are shown on Exhibit 2.3-1.

Aesthetics resources are typically defined as both the natural and built environments of the surrounding landscapes that influence the public's enjoyment and appreciation of the environment. A visual or aesthetic impact may occur depending on the extent to which a project's presence would alter the visual character of the area in which it is located.

Visual Character

Visual character includes attributes such as form, line, color, and texture, and is used to describe, not evaluate; that is, these attributes are neither considered good nor bad. However, a change in visual character can be evaluated when it is compared with the viewer response to that change. Changes in visual character can be identified by how visually compatible a proposed project would be with the existing condition by using visual character attributes as an indicator. For this project, the following attributes were considered:

Dominance is position, size, or contrast;
Scale is apparent size as it relates to the surroundings;
Form is visual mass or shape;
Color is reflective brightness (light, dark) and hue (red, green); and
Continuity is uninterrupted flow of form, line, color, or textural pattern.

Visual Quality

Visual quality is evaluated by identifying the vividness, intactness, and unity present in the project corridor. Public attitudes validate the assessed level of quality and predict how changes to the project corridor can affect these attitudes. This process helps identify specific methods for addressing each impact that may occur as a result of the project. The three criteria for evaluating visual quality are defined below:

Vividness is the extent to which the landscape is memorable and is associated with distinctive, contrasting, and diverse visual elements.

Intactness is the integrity of visual features in the landscape and the extent to which the existing landscape is free from non-typical visual intrusions.

Unity is the extent to which all visual elements combine to form a coherent, harmonious visual pattern.

Affected Viewers
Travelers and project neighbors are people who have views *to* the improved area. For this project, the following project neighbors include travelers on Vista Del Sol. Local residents with existing views of the subject property may also be affected viewers, including those within the Rancho Mirage Country Club and Wilshire Palms residential development located north and south of the subject property, respectively. Future residents anticipated to occupy adjacent and nearby residential lands could also be affected by development proposed under the Project PDP.

Visual Sensitivity
Visual sensitivity is a measure of the viewer's recognition of a particular object. It has three attributes: activity, awareness, and local values. Activity relates to the preoccupation of viewers – are they preoccupied, thinking of something else, or are they truly engaged in observing their surroundings. The more they are actually observing their surroundings; the greater the sensitivity the viewer will have of changes to visual resources. Awareness relates to the focus of the view – the focus is wide, and the view is general, or the focus is narrow and the view specific. The more specific the awareness, the more sensitive a viewer is to change.

Existing Visual Environment

The subject and surrounding properties are located on rolling stabilized sand dunes on the valley floor, where undeveloped lands are characterized by undulating dunes and sand fields punctuated by creosote bush and herbaceous plans, and expanses of loose sand. The existing visual or scenic environment at and in the vicinity of the subject property is characterized by large expanses of urbanized lands that include the Eisenhower Medical Center campus, master planned residential communities (Rancho Mirage Country Club and Wilshire Palms), smaller large-lot subdivisions and numerous vacant 5± acre lots located on the east and west sides of Vista Del Sol and extending north to Frank Sinatra Drive. The visual resources along Vista Del Sol are also characterized by the partially graded and constructed roadway and some dumping of largely construction wastes. Mountain views are visible along three of the four compass points, with views of the Santa Rosa Mountains to the south being the most prominent. There are no streetlights along Vista Del Sol although security lighting at nearby homes is evident.

2.3.6 Project Impacts

The proposed PDP Project will result in the removal of four existing one-story residential inpatient buildings located on the western portion of the HBFC campus with two two-story residential inpatient buildings in the same campus location and oriented north-south. The southerly most of these two new buildings will be located approximately 250 feet north of the HBFC south property line, while the new north building will be located approximately 860 feet south of the nearest home within the Rancho Mirage Country Club development. These buildings will not exceed 30 feet at the top of parapet, but include limited incidental architectural features up to 32± feet above finished grade. Solar panels are contemplated atop these two buildings and are estimated to project 18± inches above the parapet. Please see Exhibits 1-6A and 1-6B showing building elevations.

The proposed PDP Project also includes the development of a one-story day-treatment building, which is planned for construction approximately 100 feet west of Vista Del Sol and 290± feet north of the south property line. This building is oriented east-west and includes an upward and westward sweep to the roof where a lecture hall is planned. The east end of this building ranges from 13 to 20 feet above finished grad, while the west end with the lecture hall has a maximum height of 25.4± feet. Please see Exhibits 1-6A And 1-6B showing building elevations.

Landscape Treatment: Vista Del Sol Entry and Parkway
Changes in landscaping proposed as a part of the subject PDP Project and having the potential to affect views or other scenic resources are limited to the northeast, east and southeast perimeters of the HBFC campus. A new campus entry drive from Vista Del Sol is also proposed with landscape statement and perimeter decorative masonry wall beginning approximately 40 feet north and south of the new access drive. The entry and Vista Del Sol parkway plantings are a desert palette that include, palo verde, Texas ebony, Muhlenbergia, golden barrel cactus, desert annual, groupings of boulders and gravel. Beyond the aforementioned six foot masonry wall will be a ficus hedge.

Light and Glare
The development of the PDP Project has the potential to create substantial light and glare if such design issues are not carefully addressed in campus lighting design. Common sources of light and glare include streetlights, parking lot lighting, on-building security lighting, illuminated signage, and the reflection of light off of cars and other reflective surfaces. Parking lot lighting can be a major direct and indirect (reflective) contributor to ambient light levels. The light environment on the HBFC campus is comparable to or lower than that on the adjoining EMC campus but substantially higher than existing lighting levels along the adjoining Vista Del Sol to the east.

A photometric analysis[1] was conducted along the boundary of the developed portion of the HBFC campus with light levels measured in foot-candles[2], which generally shows very low lighting levels along the campus boundary ranging from 0.0 to about 3 foot-candles. Campus locations where levels of boundary illumination are higher are associated with elevated light poles adjacent to parking and security areas, with existing lighting levels that range from 6 to 46.4 foot-candles. The vast majority of campus boundary illumination falls in within the 0.0 to 5 foot-candle range.

The proposed new building and site plans have been reviewed to determine the degree to which the proposed Project could adversely contribute to light and glare in the area. Parking lot and on-building security lighting need to meet minimum levels for safety and security but will be limited in extent and planned intensity. Upgrading and additional pedestrian-level lighting is also planned throughout the site. The potential for reflective glare from building facades appears to be limited, with the extensive use of building canopies and sunscreens to shade windows from direct sunlight to the degree practicable.

The HBFC campus PDP plans include low lighting levels and lighting that protects the night sky as criteria for determining appropriate lighting levels. A detailed project lighting plan will be prepared that controls the type, size and location of a full range of lighting fixtures and levels. Mitigation measures set forth below ensure the use of the lowest levels of lighting practicable to provide adequate illumination, visibility and safety.

Viewshed Analyses
In order to fully evaluate the potential impacts of the proposed Project on the surrounding scenic vistas, the development site and improvements were analysed using 3D computer modeling based on flown topographic data of the site and surrounding lands, and CAD drawings representing changes in the site plan, buildings to be demolished, new buildings and landscaping shown in the Project PDP application. The six viewsheds selected for analysis were felt to represent the most sensitive and most likely to be affected by the proposed Project. These include the following views:

A. View from within Wilshire Palms development looking north into the HBFC campus
B. View looking south from back patio area of nearest homes within Rancho Mirage Country Club
C. View from east side of Vista Del Sol looking west into HBFC campus site at proposed new entry

[1] "Existing Site Lighting Photometric Plan" prepared by RTM Engineering Consultants. January 2020.
[2] A foot-candle is a unit of illumination equal to that given by a source of one candela at a distance of one foot (equivalent to one lumen per square foot or 10.764 lux). Also equivalent to 0.016 watts.

D. View from northeast corner of HBFC campus looking southwest across site
E. View looking north from within new residential lot immediately south of HBFC campus
F. View looking south from the Barbara Sinatra Children's Center site



Source: Visionscape Imagery, 2020

02.05.20

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Hazelden Betty Ford Center PDP EIR
Viewshed Impact Key Map
Rancho Mirage, California

Hazelden Betty Ford Foundation

Exhibit
2.3-1



Existing View



Proposed View

04.09.20

Source: Visionscape Imagery, 4.2020

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Hazelden Betty Ford Center PDP EIR
Viewshed Impacts Analysis A
Rancho Mirage, California

Hazelden Betty Ford Foundation

Exhibit
2.3-1A



Existing View



Proposed View

04.09.20

Source: Visionscape Imagery, 4.2020

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Hazelden Betty Ford Center PDP EIR
Viewshed Impacts Analysis B
Rancho Mirage, California

Hazelden Betty Ford Foundation

Exhibit
2.3-1B



Existing View



Proposed View

Source: Visionscape Imagery, 4.2020

04.09.20

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Hazelden Betty Ford Center PDP EIR
Viewshed Impacts Analysis C
Rancho Mirage, California

Hazelden Betty Ford Foundation

Exhibit
2.3-1C



Existing View



Proposed View

04.13.20

Source: Visionscape Imagery, 4.2020

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Hazelden Betty Ford Center PDP EIR
Viewshed Impacts Analysis D
Rancho Mirage, California

Hazelden Betty Ford Foundation

Exhibit
2.3-1D



Existing View



Proposed View

04.09.20

Source: Visionscape Imagery, 4.2020

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Hazelden Betty Ford Center PDP EIR
Viewshed Impacts Analysis E
Rancho Mirage, California

Hazelden Betty Ford Foundation

Exhibit
2.3-1E



Existing View



Proposed View

04.09.20

Source: Visionscape Imagery, 4.2020

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Hazelden Betty Ford Center PDP EIR
Viewshed Impacts Analysis F
Rancho Mirage, California

Hazelden Betty Ford Foundation

Exhibit
2.3-1F

Viewsheds A, B and F
As can be seen with Viewsheds A, B and F, existing development and landscaping screens the HBFC campus from sight and the proposed Project will have no impact on these existing viewsheds. It should also be noted that existing landscaping separating and buffering the HBFC and EMC campuses will not result in any new visual impacts to viewsheds from within the EMC campus.

Viewshed C: Vista Del Sol Looking West
As can be seen from this visual simulation (see Exhibit 2.3-2) of the proposed entry drive, the treatment includes a 6-foot perimeter wall beginning approximately 40 feet north and south of the entry drive and approximately 35 feet from the curb along Vista Del Sol. The desert landscaping treatment is visually compatible with and complements the natural desert vegetation of surrounding undeveloped lands. The proposed improvements obscure views into the HBFC campus and reduce the visibility of the distant San Jacinto Mountains and the much more distant San Bernardino Mountains. Project impacts to San Jacinto views appear minimal. The relatively low profile, scale and setback of the proposed day-treatment building will provide a coherent and aesthetically pleasing extension of the Vista Del Sol parkway landscaping to the south. The entry and parkway treatment are low profile and appear to be comparable with or superior to that already installed to the immediate south and serving small residential subdivisions. The analysis prepared for Viewshed C indicate that Project impacts as seen from this and comparable perspectives will be less than significant.

Viewshed D: Vista Del Sol Looking Southwest
The Viewshed D analysis evaluates the impacts that may be seen from the traveling public southbound on Vista Del Sol looking southwest from the northeast corner of the HBFC campus at Vista Del Sol. The primary change to the viewshed is in the foreground where desert scrub will be replaced by formal parkway landscaping, and masonry wall and on-site landscaping that provide continuity of treatment along the entire Visa Del Sol frontage. Limited east, west and central portions of the day-treatment building are visible from this viewpoint. Southwest views to the Santa Rosa and southerly San Jacinto Mountains are largely preserved. Viewshed impacts appear to be limited and less than significant.

Viewshed E: Southerly Subdivision Looking North
The Viewshed E analysis is taken from the finished pad of the northeasterly of the newly graded residential lot in this new four parcel one-acre lot subdivision. The view is due north to the existing wall separating this lot from the HBFC campus and the future day-treatment building to be located 290± feet to the north. Views to the north are already affected by the residential subdivision's new block wall beyond which can be seen the ridgeline of the Little San Bernardino Mountains and the SCE powerlines marching northward. The proposed day-treatment building will project into the lower portion of the mountain views but the impact is limited and most evident on the west side and adjacent to the currently developed portions of the campus. The proposed day-treatment building and new landscaping will replace views of creosote and introduce a relatively low profile development with a varying elevation and softened by new landscaping. Viewshed impacts appear to be limited and less than significant.

Based upon the HBFC PDP development plans, including preliminary engineering and architectural and landscape design, and from the computer-generated viewshed analyses prepared for this project, the following responds to the threshold questions posed by CEQA.

a) Have a substantial adverse effect on a scenic vista?

Less Than Significant Impact. As indicated by the six viewshed analyses prepared for this project, the HBFC PDP Project will have a limited and less than significant impact on existing viewsheds as seen from surrounding residential properties and from public rights-of-way. Adjoining and nearby existing residences to the north and south are approximately 850 feet and 250 feet, respectively, from the closest new HBFC building allowed under the Proposed PDP and do not have direct views into the HBFC campus. Neither do employees or visitors to the Barbara Sinatra Children's Center have views into the HBFC campus, and the proposed Project will not further

affect these views. The future northerly views of the one future residence to the south, which shares a common 335± foot boundary with the HBFC campus, could be somewhat affected by the Project, but impacts to viewshed from this lot will also be less than significant (see Viewshed E).

b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

No Impact. The proposed Project and surrounding lands are comprised of a common desert floor landform of sand fields, dunes and hummocks, much of which has been converted to a variety of urban land uses. Scenic resources in the area are essentially those associates with the surrounding mountain vista. There are no distinguished trees, rocky outcroppings or historic buildings or structures in the Project area. Therefore, the proposed Project will have no significant impact or cause substantial damage to a scenic resource. The proposed Project is also far removed from a state-designated scenic highway and will have no impact on an eligible or designated scenic highway, the nearest such highway being Highway 74 in Palm Desert.

c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

Less Than Significant Impact. As viewed from public rights of way and from surrounding lands, the proposed Project will alter already developed portions of the HBFC campus, as well as resulting in grading and developing approximately 6.5± acres of largely vacant campus lands as a part of the campus buildout and construction of the west half of Vista Del Sol fronting the subject property. As can be seen from Viewsheds C, D and E, construction of the proposed Project will remove a shallow strip of desert land remaining between Vista Del Sol and the already developed portions of the HBFC campus. It will result in a continuation of entry and parkway treatments to the immediate south and continuing to Country Club Drive to the south.

Beyond Project improvements to Vista Del Sol and new parkway landscaping and masonry wall, limited portions of existing and proposed HBFC campus development will also be visible from certain vantage points along Vista Del Sol north of the Project site for southbound travelers. Beyond these limited and less than significant impacts to the visual character of viewsheds along Vista Del Sol, a single vacant one-acre residential lot located immediately south of the proposed campus expansion could also be affected by the proposed Project. As shown on Exhibit 2.3-1E, the impacts of new HBFC development pursuant to the proposed PDP Project will have a limited effect on the subject northerly viewshed and will be less than significant.

The Proposed PDP Project is consistent with the provisions, standards and guidelines of the EMC Specific Plan and is consistent with the City General Plan policies by providing a widened parkway and building setbacks that maximize view preservation, enhanced parkway and perimeter landscaping, and minimized visual impact of perimeter walls.

In summary based upon the design elements set forth in the PDP application and the analysis set forth above, the proposed Project will not substantially degrade the existing visual character or quality of public views of the site or its surroundings. Neither will it conflict with applicable zoning and other regulations governing scenic quality.

d) Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?

Less Than Significant With Mitigation. As noted above, the PDP Project will change existing lighting and provide new lighting as a part of this expansion. Based upon the findings of the photometric study conducted along the Project boundaries, parking lot lighting will be the biggest contributor to ambient light levels. The existing light environment on the HBFC campus is comparable to or lower than that on the adjoining EMC campus but

substantially higher than existing lighting levels along the adjoining Vista Del Sol to the east where vacant lands predominate. The photometric shows very low existing lighting levels along the campus boundary ranging from 0.0 to about 3 foot-candles, with the exception of a few locations with elevated light poles adjacent to parking and security areas with lighting levels that range from 6 to 46.4 foot-candles. The vast majority of campus boundary illumination falls in within the 0.0 to 5 foot-candle range.

A preliminary lighting plan has been prepared for the proposed Project. Parking lot and on-building security lighting need to meet minimum levels for safety and security but will be limited in extent and planned intensity, according to the Project architect. Proposed parking lot fixtures will be 18'-0" high and provide 0.5fc min and avg/min uniformity of 1:3 in compliance with City requirements. New area lighting is also planned along the new Vista Del Sol entry, and upgrading and adding pedestrian-level lighting is also planned throughout areas of new development and site renovation. The potential for reflective glare from building facades appears to be limited, with the extensive use of building canopies and sunscreens to shade windows from direct sunlight to the degree practicable.

The applicant has indicated that final landscape design will provide final lighting plans that incorporate low lighting levels and lighting that protects the night sky as criteria for determining appropriate lighting levels. A detailed project lighting plan will be prepared that controls the type, size and location of a full range of lighting fixtures and levels. Mitigation measures set forth below ensure the use of the lowest levels of lighting practicable to provide adequate illumination, visibility and safety.

2.3.7 Mitigation Measures

The HBFC proposed PDP Project addresses issues of visual and scenic resource impacts through a high standard of architectural and landscape design, prescriptive design and development standards, and through an explicit design philosophy that values the physical setting and aesthetic values of the HBFC campus and surrounding lands. These measures are briefly discussed below under "Mitigation by Design".

Avoidance/Minimization by Design
The HBFC PDP Project incorporates a variety of design features that will substantially limit the effects of the Project on the area's viewsheds. The effectiveness of site planning and design set forth in the PDP application has been demonstrated by rigorous analysis of potentially affected viewsheds, which show limited impacts to scenic views from public rights-of-way and nearby development to less than significant levels.

The HBFC PDP architectural design is prescriptive with regard to building siting, height, massing and setbacks. Project design details also address building architecture, materials, colors and textures, and related features within the HBFC campus and along Vista Del Sol. The HBFC PDP incorporates principles to mitigate some of the potential adverse effects of existing conditions and future development, while including design that visually enhances the campus and its Vista Del Sol frontage, and complements both the natural and built environments.

In this regard, the HBFC PDP Project also sets forth a landscape and irrigation design, plant palettes and inorganic landscape materials; a preliminary lighting plan has also been provided as a part of the PDP application. The Project PDP calls for the use of native and appropriate non-invasive plant species that are desert drought tolerant and compatible with existing native vegetation. Substantial portions of the currently turfed landscape area will be converted to a desert-appropriate mix of perennials and annuals.

A list of prohibited landscape materials was also provided to the applicant ensure avoidance of invasive and otherwise undesirable plant species. The HBFC PDP calls for project design and materials that establish and enhance visual order to the Vista Del Sol streetscape, enhance on-site access and parking, and campus open space areas based upon an aesthetic established by the surrounding desert.

Finally, where safety and defensible space is an issue, such as parking lots, loading and storage areas, existing and proposed project entries, and major intra-project intersections, lighting recommendations assure adequate illumination, while protecting adjoining properties and the night sky from light pollution. The proposed design minimizes adverse effects of campus lighting through proper fixture selection, siting and installation. Standard design features include: shielding and directing all outdoor lighting downward; minimizing the use of reflective surfaces where possible; using landscaping and decorative walls in combination with other design features where appropriate; and generally incorporating good design practices.

Additional Mitigation Measures

While the overall impacts to visual resources of the Hazelden Betty Ford Center PDP Project on the planning area appear to be less than significant, the following additional mitigation measures are recommended to further ensure that impacts are less than significant.

AES-1 Landscaping plans and materials applied to the perimeter of the campus shall serve to create a harmonious transition between the campus and surrounding environment. Visual order in landscape designs and materials shall be used to establish or enhance visual order to streetscapes, parking areas, building perimeters and open space areas.

AES-2 Free-standing walls and fences, where contemplated, shall be constructed as so as to minimize impacts to scenic vistas to the greatest extent practicable, and to define and delineate surrounding areas. Project landscaping should frame views, obscure or soften hard edges and enhance security.

AES-3 All outdoor lighting shall be in compliance with the Section 17.18.050 of the Rancho Mirage Municipal Code and applicable Specific Plan guidelines. Other lighting recommendations include the following:

a. Outdoor lighting shall be limited to the minimum height, number and intensity of fixtures needed to provide security and identification, taking every reasonable effort to preserve the community's night skies.

b. Lighting fixtures shall be of appropriate scale, style and character of the architecture. No lighting which incorporates flashing, pulsing or is otherwise animated shall be permitted.

c. The intensity of light at the boundary of the HBFC campus shall not exceed seventy-five (75) foot lamberts from a source of reflected light.

d. All lighting shall be directed onto the site and away from adjacent properties with appropriate shielding, and minimal fixture height to ensure minimum impact on adjoining lands and streets.

e. Elevated lighting, including but not limited to parking lot lighting, shall be full-cutoff fixtures. Drop or sag lens fixtures shall not be permitted.

AES-4 Landscape lighting shall be shielded to direct and limit areas of illumination to the subject property. No up-lighting that spills into the night sky shall be used on the campus. Landscape lighting shall be included with the final landscape plans.

AES-5 Exterior building and other security lighting shall be integral to the building architecture and/or landscape plan, shall avoid excessive lighting levels and direct and shield illumination to protect adjoining properties and night skies.

AES-6 All on-site electrical power lines shall be installed underground. Transformers and other power conditioning equipment shall be pad-mounted or placed in underground vaults, as determined appropriate by the HBFC and Southern California Edison (SCE). Existing SCE transmission lines in the future Visa Del Sol right of way are not required to be undergrounded.

AES-7 Final (FDP) site plan, architectural elevations, including building materials and colors, landscaping and lighting, and other design elements that affect the appearance of the HBFC campus shall substantially conform with those set forth in the subject HBFC PDP Project.

2.3.8 Significance After Mitigation

Based on the above analysis, the proposed Project will not have a significant adverse impact on aesthetic resources in the project area. With adherence to the above recommended mitigation measures, Project impacts are further assured to be less than significant. Improvements associated with the proposed Project will not significantly affect the aesthetic resources of the site or project area.

2.3.9 Cumulative Impacts

The planning area visual resources were analyzed to determine the extent of the impacts the proposed PDP Project would have on these resources. The cumulative impacts of the Project are based on an assessment of local and the regional impacts, and the scope of the analysis was based on the City's General Plan and Zoning policies and standards relating to visual resources and lighting. The construction and use activities associated with this Project will be minimally visible to nearby residents and the traveling public, whose views shall be largely maintained because the project does not propose structures or other improvements that create a significant amount of new visual clutter or obstruction of views.

Cumulative impacts are those resulting from past, present, and reasonably foreseeable future actions, combined with the potential visual impacts of this Project. The Project is part of an existing and well-established land use, is located within an area of existing institutional development and activity, and with limited and well-buffered residential use. The Project will not significantly change the scenic vistas or visual character of the area. Because of the limited new net construction proposed, the Project will not contribute to cumulative increases in visual effects in the project area. Aesthetic impacts associated with the implementation of the proposed Project will be less than cumulatively considerable.

2.4 Air Quality

2.4.1 Introduction

The following section describes existing air quality in the Coachella Valley and analyzes the potential impacts associated with the HBFC PDP Project. A variety of local and regional data and information, ranging from research and analysis conducted for the Project site to regional-scale planning and environmental documents, have been used in researching and analyzing the project and its potential effects on air quality. The South Coast Air Quality Management District analysis guidelines were also used. An analysis of the proposed Project's potential greenhouse gas emissions can be found in Section 2.8 of this EIR. An Air Quality and Greenhouse Gas Report was prepared for the Project and is provided in Appendix B of this EIR.

2.4.2 Thresholds of Significance

The following thresholds or criteria are derived from Appendix G of the Guidelines and are used to determine if and to what extent a project may have a potentially significant impact on air quality. The project would have a significant effect on air quality if the proposed Project would:

a) Conflict with or obstruct implementation of the applicable air quality plan?

b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?

c) Expose sensitive receptors to substantial pollutant concentrations?

d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

2.4.3 Regulatory Framework

Federal and state agencies have adopted air quality standards for a variety of pollutants. In 1971, the USEPA established the National Ambient Air Quality Standards (NAAQS) for managing criteria pollutants. The California Clean Air Act (CCAA) became effective on January 1, 1989 and mandated health-based air quality standards at the state level. The California Air Resources Board (CARB) is responsible for enforcing state standards, which are generally more stringent than federal standards. One of the ways standards are applied is through State Implementation Plans (SIP), which are prepared to assist regional air quality management districts in meeting the federal and state ambient air quality standards in accordance with the deadlines specified in the Federal Clean Air Act (CAA) and emission reduction targets of the California Clean Air Act.

Regional and local agencies have also assumed some responsibility for assuring that state and federal air quality standards are achieved. California is divided geographically into air basins for the purpose of managing air resources. The Coachella Valley is in the Salton Sea Air Basin (SSAB), and the South Coast Air Quality Management District (SCAQMD) is responsible for establishing air quality measurement criteria and relevant management policies for the SSAB.

The SSAB, including the Coachella Valley, is subject to the provisions of the SCAQMD Rule Book,[1] which sets forth policies and other measures designed to meet federal and state ambient air quality standards. These rules, along with SCAQMD's 2016 Air Quality Management Plan, are intended to satisfy the planning requirements of both the federal and State Clean Air Acts. The SCAQMD also monitors daily pollutant levels and meteorological conditions throughout the District.

The 2003 PM_{10} Coachella Valley State Implementation Plan (CVSIP) was jointly developed by the SCAQMD, Coachella Valley Association of Governments (CVAG) and its member cities and was approved by the USEPA. The 2003 PM_{10} CVSIP updated the 1990 plan, which was drafted as a requirement of the federal Clean Air Act to demonstrate expeditious attainment of PM_{10} standards.[2] On April 18, 2003, the USEPA approved the updated CVSIP.

Air Quality Standards

Federal and state air quality standards established for specific pollutants, which are called "criteria pollutants," are designed to protect the general population and especially that segment of the population that is most susceptible to respiratory distress or infection, including the elderly, children, asthmatics, or those weak from disease or illness. The following air pollutants are collectively known as criteria air pollutants and are defined as pollutants for which established air quality standards have been adopted by federal and state governments:

Ozone (O_3) is a pungent, colorless, toxic gas, and a component of photochemical smog. It is formed when byproducts of combustion react in the presence of ultraviolet sunlight. This process takes place in the atmosphere where oxides of nitrogen combine with reactive organic gases, such as hydrocarbons. Exposure to ozone can result in diminished breathing capacity, increased sensitivity to infections, and inflammation of the lung tissue. Children and people with pre-existing lung disease are most susceptible to the effects of ozone. The SSAB is in non-attainment for the federal 8-hour O_3 standard.

Carbon Monoxide (CO) is a colorless, odorless, toxic gas and a byproduct from the partial combustion of fossil fuels, most notably from automobiles and other motor vehicles. Carbon monoxide passes through the lungs directly into the blood stream and reduces the amount of oxygen reaching the vital organs, such as the heart, brain, and tissues. In high concentrations, carbon monoxide can contribute to the development of heart disease, anemia, and impaired psychological behavior. Individuals that have heart and blood diseases, smokers, babies in utero, and people with chronic hypoxemia are most susceptible to the effects of CO. The SSAB is in attainment for CO.

Nitrogen Oxide (NO_x) includes Nitric oxide (NO) and Nitrogen dioxide (NO_2), which are the primary oxides of nitrogen, and combined are known as nitrogen oxides. These oxides are produced at high temperatures during combustion as byproducts of motor vehicles, power plants, and off-road equipment. NOx contributes to the formation of ozone serving as the primary receptor of ultraviolet light and initiating the photochemical reaction. Short-term exposure to nitrogen dioxide can result in airway constriction and diminished lung capacity and is highly toxic by inhalation. Populations living near roadways are more likely to experience the effects of nitrogen oxides due to elevated exposure to motor vehicle exhaust. The SSAB is in attainment for NO_2.

Sulfur Dioxide (SO_2) results from the combustion of high-sulfur content fuels, such as coal and petroleum. Sources include motor vehicle fuel combustion, chemical manufacturing plants, and sulfur recovery plants. Sulfur dioxide is a colorless, pungent, extremely irritating gas that can cause airway constriction and severe breathing difficulties in asthmatics. High levels of exposure can cause fluid accumulation in the lungs, damage to lung tissue, and sloughing off of cells lining the respiratory tract. The SSAB is in attainment for SO_2.

1 South Coast Air Quality Management District Rules and Regulations, Adopted February 4, 1977, as amended.
2 2003 Coachella Valley PM_{10} State Implementation Plan, August 1, 2003.

Particulate Matter (PM_{10} and $PM_{2.5}$) consists of fine suspended particles of ten microns or smaller in diameter, and are the byproducts of road dust, sand, diesel soot, windstorms, and the abrasion of tires and brakes. The elderly, children, and adults with pre-existing respiratory or cardiovascular disease are most susceptible to the effects of PM. Elevated PM_{10} and $PM_{2.5}$ levels are also associated with an increase in mortality rates, respiratory infections, occurrences and severity of asthma attacks, and hospital admissions. The SSAB is a non-attainment area for PM_{10} and is classified as attainment/unclassifiable for $PM_{2.5}$.

Volatile Organic Compounds (VOC) are also known as Reactive Organic Gas (ROG). This class of pollutants has no state or federal ambient air quality standards and is not classified as criteria pollutants; however, they are regulated because they are responsible for contributing to the formation of ozone. They also contribute to higher PM_{10} levels because they transform into organic aerosols when released into the atmosphere. VOCs pose a health threat when people are exposed to high concentrations. Benzene, for example, is a hydrogen component of VOC emissions known to be a carcinogen.

Lead (Pb) occurs in the atmosphere as particulate matter resulting from the manufacturing of batteries, paint, ink, and ammunition. Exposure to lead can result in anemia, kidney disease, gastrointestinal dysfunction, and neuromuscular and neurological disorders. Babies in utero, infants, and children are especially susceptible to health risks associated with exposure to lead by impacting the central nervous system and causing learning disorders. The SSAB is in attainment for lead.

The air quality of a particular locale is considered to be in attainment if the measured ambient air pollutant levels for O_3, CO, SO_2 (1-hour and 24-hour), NO_2, and PM_{10} and $PM_{2.5}$ are not exceeded and all other standards are not equaled or exceeded at any time in any consecutive three-year period. Attainment also assumes the national standards (other than O_3, PM_{10}, and those based on annual averages or arithmetic mean) are not exceeded more than once per year. The O_3 standard is in attainment when the fourth highest eight-hour concentration in a year, averaged over three years, is equal to or less than the standard. For PM_{10}, the 24-hour standard is attained when 99 percent of the daily concentrations, averaged over three years, are equal to or less than the standard.

The following table shows the state and national ambient air quality standards for criteria pollutants.

Table 2.4-1
State and National Ambient Air Quality Standards

Pollutant	State Standards		National Standards**	
	Avg. Time	Concentration	Avg. Time	Concentration
Ozone (O_3)	1-hour 8-hour	0.09 ppm 0.07 ppm	1-hour 8-hour	None 0.070 ppm
Carbon Monoxide (CO)	1-hour 8-hour	20.0 ppm 9.0 ppm	1-hour 8-hour	35.0 ppm 9.0 ppm
Nitrogen Dioxide (NO_2)	1-hour AAM	0.18 ppm 0.030 ppm	1-hour AAM	0.10 ppm 0.053 ppm
Sulfur Dioxide (SO_2)	1-hour 24-hour AAM	0.25 ppm 0.04 ppm None	1-hour 24-hour AAM	0.075 ppm 0.14 ppm 0.03 ppm
Particulate Matter (PM_{10})	24-hour AAM	50 µg/m^3 20 µg/m^3	24-hour AAM	150 µg/m^3 None
Particulate Matter ($PM_{2.5}$)	AAM 24-hour	12 µg/m^3 None	AAM 24-hour	12 µg/m^3 35 µg/m^3
Lead	30-day Avg.	1.5 µg/m^3	3-month Avg.	0.15 µg/m^3
Visibility Reducing Particles	8-hour	No standard	No Federal Standards	
Sulfates	24-hour	25µg/m^3		
Hydrogen Sulfide	1-hour	0.03 ppm		
Vinyl Chloride	24-hour	0.01 ppm		

Source: California Air Resources Board, accessed 1/30/20.
Notes: ppm = parts per million; ppb= parts per billion; µg/ m^3 = micrograms per cubic meter of air; AAM = Annual Arithmetic Mean.

Regional Air Quality Monitoring

The South Coast Air Quality Management District operates and maintains three air quality monitoring stations within Source Receptor Area (SRA) 30 (Coachella Valley). SR 30 includes the Indio, Palm Springs, and Mecca monitoring stations, which have been operational since 1985, 1987, and 2013, respectively. Both Indio and Palm Springs stations monitor for ozone and PM_{10}. The Mecca station monitors for PM_{10}.

The following tables show the maximum concentration and number of days annually that state and federal standards for ozone and particulate matter (PM_{10}) were exceeded between 2010 and 2018 in the Coachella Valley.

Table 2.4-2 shows that federal and state 24-hour standards for PM_{10} were exceeded more frequently at the Indio station between 2010 and 2018. Limited 24-hour state data has been provided from all three stations over the past several years; however, it is assumed that PM_{10} levels continue to exceed state standards until otherwise reported.

Table 2.4-2
PM_{10} Monitoring Data for the Coachella Valley

Monitoring Station	Year	Maximum Concentration (µg/m³/24 hours) **	No. Days Exceeding 24-hr. Standards		Annual Average (µg/m³)
			Federal[1]	State[2]	AAM[3]
Palm Springs	2010	144.8	0.0	0.0	19.4
	2011	396.9	2.0	0.0	21.7
	2012	143.4	0.0	0.0	19.9
	2013	185.8	1.0	13.1	23.1
	2014	313.8	1.1	*	25.4
	2015	199.0	1.0	*	20.9
	2016	447.2	1.1	*	23.1
	2017	105.6	0.0	*	22.1
	2018	422.3	2.0	0	22.9
Indio	2010	107.0	0.0	23.9	28.8
	2011	375.9	2.0	18.6	32.6
	2012	270.6	*	43.2	33.6
	2013	255.2	3.0	85.2	37.5
	2014	322.3	6.1	94.9	43.5
	2015	381.0	*	*	44.0
	2016	393.2	*	135.7	37.0
	2017	198.6	1.0	*	34.8
	2018	336.0	2.2	88.4	34.8
Mecca	2014	*	*	*	*
	2015	306.4	5.0	*	44.2
	2016	468.9	*	*	41.1
	2017	477.6	*	81.5	47.5
	2018	275.2	6.3	*	40.8

Source: Annual air quality site monitoring reports per ARB. https://www.arb.ca.gov/adam, accessed January 2020.
[1] = > 150 µg/m³ in 24 hour period; [2] = > 50 µg/m³ in 24 hour period; [3] Federal Annual Average Standard AAM > 50µg/m³ revoked December 17, 2006. State standard is AAM > 20µg/m³
4 State Annual Average Standard = AGM > 20µg/m³
* There are insufficient (or no) data available to determine the value.
** Data may include exceptional events.

Table 2.4-3 shows that the Palm Springs monitoring station exceeds the 8-hour federal and state ozone standards more frequently than the Indio site. This exceedance is attributable to the Palm Springs station's location closer to the San Gorgonio Pass where ozone is imported into the SSAB from air basins to the west.

Table 2.4-3
Ozone Monitoring Data for the Coachella Valley

Monitoring Station	Year	Max. Concentration		No. Days Standard Exceeded		
				Federal[1]	State[2]	
		1 Hour ppm	8 Hour ppm	8 Hour	1 Hour	8 Hour
Palm Springs	2010	0.114	0.099	76	20	78
	2011	0.124	0.098	66	21	69
	2012	0.126	0.100	76	17	79
	2013	0.113	0.104	76	10	82
	2014	0.108	0.093	55	9	61
	2015	0.102	0.092	47	3	51
	2016	0.103	0.092	46	6	48
	2017	0.113	0.097	57	18	63
	2018	0.111	0.099	56	11	58
Indio	2010	0.100	0.087	45	6	45
	2011	0.099	0.090	40	3	42
	2012	0.102	0.089	43	2	45
	2013	0.105	0.087	35	2	38
	2014	0.095	0.091	24	2	30
	2015	0.093	0.085	11	0	12
	2016	0.099	0.089	27	3	29
	2017	0.107	0.093	44	8	47
	2018	0.106	0.091	49	4	52

Source: ARB Annual Air Quality Data Tables. https://www.arb.ca.gov/adam, accessed January 2020.
1 = > 0.070 parts per million for the 8 hour standard.
2 = > 0.09 and 0.070 parts per million in 1 hour and 8 hour, respectively.

Criteria Air Pollutant Designations

Air quality in the SSAB exceeds state and federal standards for fugitive dust (PM_{10}) and ozone (O_3). Ambient air quality in the SSAB, including the project area, does not exceed state and federal standards for carbon monoxide, nitrogen dioxides, sulfur dioxide, lead, sulfates, hydrogen sulfide, or Vinyl Chloride. The following table shows the basin's federal and state attainment status for criteria pollutants.

Table 2.4-4
Salton Sea Air Basin Designation Status

Criteria Pollutants	Federal Designation	State Designation
Ozone – 8-hour standard	Nonattainment	Nonattainment
Carbon Monoxide	Attainment	Attainment
Nitrogen Dioxide	Attainment	Attainment
Sulfur Dioxide	Attainment	Attainment
PM_{10}	Nonattainment	Nonattainment
$PM_{2.5}$	Attainment	Attainment

Source: U.S. EPA Green Book, last updated January 31, 2020.

Rancho Mirage General Plan

The following General Plan air quality policies are relevant to the proposed Project:

Policy AQ 1.5: The City shall review all development proposals for potential adverse effects on air quality and require mitigation of any significant impacts.

Policy SAFE 1.2: The City shall establish ordinances and guidelines to reduce the hazards from wind-blown sand and dust.

2.4.4 Environmental Setting

Air pollution is any chemical, physical, or biological process that modifies the chemistry and other characteristics of the atmosphere. The primary contributor to air pollution is the production of byproducts from the combustion of fossil fuels containing a number of air polluting substances. These emissions are responsible for the poor air quality that is evident in industrial centers and elsewhere worldwide.

Topographic or geomorphic conditions in the Coachella Valley have had a profound effect on, and are an integral part of, the climate and diverse environments found in the region. The mountains create a "rain shadow," effectively isolating the valley from the prevailing cooler and wetter marine conditions along the coast, and creating a dry, subtropical desert environment. The area is subject to daily temperature extremes ranging from approximately 30°F to 80°F in winter and summer daytime temperatures ranging between 75°F and 120°F. In the surrounding mountains, temperatures are generally cooler than those on the valley floor, with an approximate 5°F decrease per 1,000 feet of elevation increase. In general, the valley floor is characterized by low humidity and rainfall, and a high percentage of days of sunshine.

Winter brings the most rainfall, although occasional intense storms occur in late summer or early fall that can make substantial contributions to annual rainfall. These are sometimes intense storms that result in rainfall on surrounding mountain slopes rather than on the valley floor. Mean annual rainfall averages between 2 to 4 inches on the desert floor and about 15 inches in the nearby mountains.

When the desert floor heats up and the air mass rises, the resulting thermal low pressure draws in cooler, denser marine air from the west that is funneled through the narrow San Gorgonio Pass. This effect produces strong and sustained winds, which are a major influence on the regional climate. As they pass through the valley, these winds often lift and transport large quantities of sand and dust, impacting visibility and air quality, and constituting a significant health threat.

Air inversions cause a layer of stagnant air that is trapped near the ground and loaded with pollutants from motor vehicles and other sources. Inversions occasionally occur in the Coachella Valley due to local geological and climatic conditions. Inversions create conditions of haziness caused by suspended water vapor, dust, and a variety of chemical aerosols. Due to local climactic conditions, inversion layers generally form at 6,000 to 8,000 feet above the desert floor.

2.4.5 Existing Conditions

The proposed Project area lies on the valley floor of the central Coachella Valley where soils are loose and wind erosion can be severe. The highest wind erosion susceptibility areas extend from Palm Springs to Indio. The Project site is located in an area designated as having a "severe wind erosion hazard."[3] As discussed in Sections 2.4.3 and 2.4.4, strong winds lift and transport large quantities of sand and dust and contribute to regional exceedances of PM_{10} thresholds.

Approximately 20 acres of the Project site is developed with the existing HBFC campus, buildings and facilities. The remaining eastern portion of the site is undeveloped, sparsely vegetated, and characterized by fine sandy soils.

Most of the land in the vicinity of the Project site is developed with medical and residential land uses. Land in the broader project area is developed with residential, commercial, and other urban land uses. Native soils have been replaced with buildings, paved surfaces, and urban landscaping, and wind erosion hazards have been reduced to a substantial extent.

[3] Exhibit 25: Wind Erosion Hazard, Rancho Mirage 2017 General Plan.

However, the surrounding areas to the east and north also contain undeveloped lands that are highly susceptible to wind erosion due to sparse vegetation and alluvial and aeolian soils and sands that are easily transported by strong winds. Several pockets of undeveloped land are located immediately adjacent to and within ¼-mile of the Project site along Vista Del Sol. Larger expanses of undeveloped land extend north from Frank Sinatra Drive to lands on both sides of the I-10 corridor, extending from the San Gorgonio Pass on the northwest to the City of La Quinta on the southeast.

2.4.6 Project Impacts

a) Conflict with or obstruct implementation of the applicable air quality plan?

No Impact. Under CEQA, a significant air quality impact could occur if the Project is not consistent with the applicable Air Quality Management Plan (AQMP) or would obstruct the implementation of the policies or hinder reaching the goals of that plan. The proposed Project site is located within the Salton Sea Air Basin (SSAB) and will be subject to SCAQMD's 2016 Air Quality Management Plan (2016 AQMP) and the 2003 Coachella Valley PM_{10} State Implementation Plan (2003 CV PM_{10} SIP). The AQMP is a comprehensive plan that establishes control strategies and guidance on regional emission reductions for air pollutants. The AQMP is based, in part, on the land use plans of the jurisdictions in the region.

The proposed Project site is designated as *Hospital (P/H)* on the City of Rancho Mirage General Plan Land Use Map. This Project is also located within the boundaries of the Eisenhower Medical Center Specific Plan, which serves as the zoning ordinance for the subject property. The proposed Project is an expansion of capital improvements allowed under the City General Plan and the EMC Specific Plan. Therefore, it is expected that the proposed Project will result in emissions consistent with those anticipated in the 2016 AQMP.

The SCAQMD works directly with the Southern California Association of Governments (SCAG), county transportation commissions, and local governments, and cooperates actively with all State and federal government agencies. SCAG adopted the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (2016 RTP/SCS) to comply with metropolitan planning organization (MPO) requirements under the Sustainable Communities and Climate Protection Act. The Growth Management chapter of the RTP/SCS forms the basis of land use and transportation controls of the AQMP. Projects that are consistent with the projections of population forecasts are considered consistent with the AQMP. The proposed Project is consistent with the City's land use designations and would not impact population, as employees of the proposed Project, primarily the new day treatment center, are expected to be residents of the City and region.

The proposed Project would be implemented in accordance with all applicable air quality management plans to ensure impacts to air quality are reduced to the greatest extent practicable. Actions include, but are not limited to, the preparation and enforcement of a standard dust control management plan in compliance with the CVSIP, and the enforcement of mitigation measures in the event that criteria pollutant thresholds are exceeded during construction activities.

In conclusion, the proposed Project is consistent with the assumptions underlying the AQMP and the 2003 Coachella Valley PM_{10} State Implementation Plan, and will not conflict with or obstruct implementation of the applicable air quality plan. No impact is anticipated.

b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?

Less than Significant Impact with Mitigation. Buildout of the proposed Project will result in the direct and indirect generation and emission of air pollutants during construction and operation. The California Emissions Estimator Model (CalEEMod), version 2016.3.2, was used to estimate potential air pollutant emissions associated with the proposed Project. CalEEMod output tables are provided in Appendix B of this EIR.

Project-Related Construction Emissions

It is anticipated that the Project would be built out in three phases over the course of four years with build out in late 2024. For analysis purposes, however, construction of the entire Project, including all components of the PDP, is assumed to be continuous and will occur over a 2.5-year period. This approach provides a conservative projection of maximum daily emissions with the potential for multiple Project components to be under construction at one time. Construction-related criteria pollutant emissions will be temporary and will end once construction is complete.

Construction activities include building demolition and hauling, site excavation and grading, materials import, construction worker travel, etc. Project construction data are listed below and have been applied to the CalEEMod software:

- Building demolition: 51,694 square feet
- Grading material net export: 26,217 cubic yards
- Material hauling distance: currently unknown, assumed 20-mile radius.
- Project-specific construction equipment list (see Appendix B)
- Construction of new residential halls, day care facilities, and amenities: 56 new beds and approximately 23,000 square feet of new day treatment facilities (total of 156 beds)
- New asphalt and concrete, including both on-site and improvements along Vista Del Sol: 87,129 square feet.

The following table describes pollutant emissions during construction of the proposed Project. Data represent maximum daily emissions expected over the 2.5-year buildout period.

Table 2.4-5
Construction Emissions Summary
Proposed Project
(lbs./day)

	CO	NO_x	ROG	SO_x	PM_{10}	$PM_{2.5}$
Max. Daily Emissions[1]	91	25	42	0	4	2
SCAQMD Threshold[2]	**550**	**100**	**75**	**150**	**150**	**55**
Exceeds Threshold	**No**	**No**	**No**	**No**	**No**	**No**

Source: CalEEMod Version 2016.3.2. See Appendix B for detailed tables. Value shown represents the average emissions of summer and winter outputs (rounded numbers).
1. Emissions with adherence to standard dust control measures and SCAQMD requirements for Tier 4 engines and low VOC/ROG coatings.
2. Source: "SCAQMD Air Quality Significance Thresholds" prepared by SCAQMD.

As shown in the table above, SCAQMD daily thresholds for CO, NO_x, ROG, SOx, PM_{10} and $PM_{2.5}$ will not be exceeded during construction of the proposed Project. Adherence to standard dust control measures and SCAQMD requirements for Tier 4 engines and low VOC/ROG coatings (AQ-1, -3, and -4) will ensure impacts will be less than significant.

Project-Related Operational Emissions

Operational emissions are those released over the long-term life of the proposed Project. They include emissions generated by area, energy (electricity and natural gas), and mobile sources. Area sources include consumable products, such as building maintenance and cleaning supplies, kitchen and restroom supplies, pavement off-gassing, and periodic reapplication of architectural coatings. Energy sources include the direct and indirect use of fossil fuels for energy, including natural gas and electricity use in buildings, parking lot lighting, ventilation equipment, and elevators. Mobile emissions are generated by motor vehicle trips.

The following assumptions were made in CalEEMod:

- Although the existing HBFC structures were built in the early 1980's, CalEEMod can only back track and model past years' emissions to the year 2000. For analysis purposes, existing conditions were analyzed for the year 2020 to capture increased efficiencies in mobile source technology that better characterize existing emissions. However, this also means that existing building energy efficiency is overstated, and in reality, energy source emissions would most likely be higher due to the less efficient building technology used in the 1980's compared to 2020.

- Traffic trip generation rates were derived from traffic counts conducted on December 11, 2019[4] and the 10th Edition ITE "Trip Generation" handbook[5]. The "Hospital" trip rate is 8.87 trips per bed per day, and the "Office" trip rate is 9.74 trips per 1,000 square feet per day. This amounts to approximately 1,300 daily weekday trips under existing conditions, and approximately 1,860 daily weekday trips under proposed Project conditions. Therefore, the net increase in daily trips with development of the proposed Project is approximately 560 trips.

The following table identifies the operational criteria pollutant emissions of the existing HBFC versus the full campus operations under the proposed Project. The difference in emission projections provides the overall net impacts of the proposed renovations and expansion of the HBFC per the PDP Project. As shown in the table, Project-generated operational emissions will not exceed SCAQMD thresholds for any criteria pollutant, and impacts will be less than significant.

Table 2.4-6
Operational Emissions Summary
Proposed Project
(lbs./day)

	CO	NO_x	ROG	SO_x	PM_{10}	$PM_{2.5}$
Existing Operation	*39*	*31*	*8*	*0*	*8*	*2*
*Proposed Operation**	*42*	*29*	*8*	*0*	*11*	*3*
Net Difference	**+3**	**-2**	**0**	**0**	**+3**	**+1**
SCAQMD Threshold**	**550**	**100**	**75**	**150**	**150**	**55**
Exceeds Threshold	**No**	**No**	**No**	**No**	**No**	**No**

Source: CalEEMod Version 2016.3.2. See Appendix B for detailed tables. Value shown represents the average emissions of summer and winter outputs.
* Inclusive of all buildings and operations post-Project construction.
** Source: "SCAQMD Air Quality Significance Thresholds" prepared by SCAQMD.

Health Impacts

As shown in Table 2.4-6, the project will not exceed criteria pollutant emissions thresholds as a result of buildout and operation of the proposed Project. With today's technology and model limitations, it is not scientifically possible to calculate the degree to which exposure to various levels of criteria pollutant emissions will impact an individual's health. There are several factors that make predicting a Project-specific numerical impact difficult:

- Not all individuals will be affected equally due to medical history, age, etc. Some may have medical pre-dispositions, and diet and exercise levels tend to vary across a population.
- Due to the dispersing nature of pollutants and transient nature of vehicles (the primary emission source), it is difficult to locate and identify which group of individuals will be impacted, either directly or indirectly.
- There are currently no approved methodologies or studies to base assumptions on, such as baseline health levels.

4 Hazelden Betty Ford Center Traffic Impact Analysis, Urban Crossroads, February 4, 2020.
5 Institute of Transportation Engineers (ITE) Trip Generation Manual, 10th Edition, 2017.

However, given the limited pollutant emissions associated with the buildout of the proposed PDP Project, on-site and local health risks associated with Project emissions of criteria pollutants are expected to be less than significant. This is primarily due to the relatively limited level of Project emissions and its location away from major roadways which precludes exposure to concentrated vehicle emissions. Due to the limitations described above, the extent to which the Project poses a health risk is uncertain, but some increased risk may result, regardless of how limited. Due to the limited extent of the Project, the various emission control protocols that will be required and the location of the Project site, is anticipated that health impacts will be less than significant overall.

Cumulative Contribution: Non-Attainment Criteria Pollutants

A significant impact could occur if the project would make a considerable cumulative contribution to federal or State non-attainment pollutants. The Coachella Valley portion of the SSAB is classified as a "non-attainment" area for PM_{10} and ozone. Cumulative air quality analysis is evaluated on a regional scale (rather than a neighborhood scale or city scale, for example) given the dispersing nature of pollutant emissions and aggregate impacts from surrounding jurisdictions and air management districts. Any development project or activity resulting in emissions of PM_{10}, ozone, or ozone precursors will contribute, to some degree, to regional non-attainment designations of ozone and PM_{10}.

The SCAQMD does not currently recommend quantified analyses of construction and/or operational emissions from multiple development projects, nor does SCAQMD provide methodologies or thresholds of significance to to assess the significance of cumulative emissions generated by multiple cumulative projects. However, it is recommended that a project's potential contribution to cumulative impacts should be assessed utilizing the same significance criteria as those for project-specific impacts. Furthermore, SCAQMD states that if an individual development project generates less than significant construction or operational emissions, then the development project would not generate a cumulatively considerable increase in emissions for those pollutants for which the Salton Sea Air Basin is in nonattainment.

As shown in the tables above, Project-related PM_{10} emissions are projected to be well below established SCAQMD thresholds. Emissions will be further reduced through implementation of Mitigation Measure AQ-1 which requires implementation of a Dust Control Plan in accordance with SCAQMD Rule 403.1. Therefore, the proposed Project will result in incremental, but not cumulatively considerable impact on regional PM_{10} levels.

CO, NO_x, and ROG are precursors to ozone, for which the Coachella Valley is in non-attainment. As shown in Table 2.4-6, the Project will not exceed thresholds for these pollutants. Emissions will be further reduced through implementation of Mitigation Measure AQ-2, which requires that all construction equipment meet or exceed the California Air Resources Board (CARB) and U.S. Environmental Protection Agency (USEPA) Tier 4 off-road emissions standards for equipment rated at 50 horsepower or greater during Project construction. Therefore, the proposed Project will result in incremental, but not cumulatively considerable impact on regional PM_{10} levels.

c) Expose sensitive receptors to substantial pollutant concentrations?

Less than Significant Impact. The purpose of analyzing Localized Significance Thresholds (LST) is to determine whether a project may generate significant adverse localized air quality impacts to the nearest exposed individual or sensitive receptor. Land uses that are sensitive receptors include, but are not limited to schools, churches, residences, hospitals, day care facilities, and elderly care facilities. The nearest sensitive receptors to the proposed Project are residences to the south in the Wilshire Palms project, and Eisenhower Medical Center facilities located immediately adjacent to the subject property to the north and west.

Analysis of LSTs by a local government is voluntary and is designed for projects that are less than or equal to five acres. The maximum area of disturbance associated with buildout of the proposed Project would not exceed 5 acres, and it is assumed that buildout would occur over the course of four years. Although the total project area is greater

than five acres, the area of daily disturbance (for purposes of LST analysis only) is limited to five acres or less per day at any given location. Therefore, the five-acre look up table is appropriate under the SCAQMD's methodology to screen for potential localized air quality impacts.[6]

The Mass Rate Look-Up tables for LSTs were used to determine if the proposed Project would have the potential to generate significant adverse localized air quality impacts during construction. The LST for Source Receptor Area (SRA) 30 (Coachella Valley) was used to determine LST emission thresholds. The distance from the emission source and the maximum daily site disturbance also determines emission thresholds. For analysis purposes, the worst-case scenario of a sensitive receptor being within 25 meters was used.[7]

The following table shows that LST thresholds are not expected to be exceeded for any criteria pollutant during construction. Because the proposed land uses do not include major stationary polluters (such as a landfill, chemical plant, oil field, refineries etc.), LST analysis was not conducted or required for Project operation. Therefore, impacts to sensitive receptors from Project construction will be less than significant.

Table 2.4-7
Localized Significance Thresholds
Proposed Project
(lbs per day)

	CO	NO_x	PM_{10}	$PM_{2.5}$
Construction	91	25	4	2
LST Threshold	2,292	304	14	8
Exceed?	No	No	No	No

Source of Emission Data: CalEEMod Version 2016.3.2, see Appendix B.
Source of LST Threshold: LST Mass Rate Look-up Table, 25 meters, 5 acres, SCAQMD.

d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Less than Significant Impact with Mitigation. The proposed Project has the potential to result in short-term odors associated with operation of heavy equipment during grading, excavation, and other construction activities. However, construction-related odors would be temporary and quickly dispersed below detectable levels as distance from the construction area increases. During Project operation, odors may be emitted from onsite food service facilities; however, all existing and proposed facilities would be equipped with proper ventilation systems to effectively remove grease, smoke, and other odors. In addition, potential odors will be further reduced through implementation of Mitigation Measure AQ-2, which requires nuisance odor abatement per SCAQMD Rule 402. Therefore, impacts associated with odors will be less than significant. The Project is not expected to result in other emissions that would adversely affecting a substantial number of people.

6 South Coast AQMD, "Fact Sheet for Applying CalEEMod to Localized Significance Thresholds." Per SCAQMD's guidance, the identified equipment is used to determine the maximum daily soil disturbance area for the purposes of evaluating localized construction impacts and is not an exhaustive list of all equipment that would be used during project construction. Additionally, the acreage identified in this table is used for the purposes of identifying a conservative Localized Significance Threshold (i.e., smaller disturbed areas have lower Localized Significance Thresholds) and does not represent a daily limit on the grading allowed on the site. In summary, the LST methodology focuses on the equipment that may be operated and acreage that may be disturbed in areas immediate proximate to potential sensitive receptors, even if other equipment may be operated or other acreage may be disturbed in areas that are farther away from the sensitive receptor.

7 The most stringent LST threshold category is for a distance 25 meters, therefore it is considered worst-case scenario.

2.4.7 Mitigation Measures

Neither construction nor operation of the proposed Project would result in significant impacts requiring mitigation measures. The following standard requirements identified by SCAQMD serve to reduce construction-related air emissions, and will be applied to the Project.

AQ-1 Dust Control Plan: SCAQMD Rule 403.1
SCAQMD Rule 403 (403.1 specific to the Coachella Valley): A Dust Control Plan shall be prepared and implemented by all contractors during all construction activities, including ground disturbance, grubbing, grading, and materials import and export. Said plan shall include but not be limited to the following best management practices:

- Treated and stabilized soil where activity will cease for at least four consecutive days;
- All construction grading operations and earth moving operations shall cease when winds exceed 25 miles per hour;
- Water site and equipment morning and evening and during all earth-moving operations;
- Operate street-sweepers on impacted paved roads adjacent to site;
- Establish and strictly enforce limits of grading for each phase of construction;
- Wash off trucks as they leave the project site to control fugitive dust emissions
- Cover all transported loads of soils, wet materials prior to transport, provide freeboard (space from the top of the material to the top of the truck) to reduce PM_{10} and deposition of particulate matter during transportation
- Use track-out reduction measures such as gravel pads at project access points to minimize dust and mud deposits on roads affected by construction traffic.

AQ-2 SCAQMD Rule 402: The project shall adhere to nuisance odor abatement requirement.

AQ-3 SCAQMD Rule 1113 (Architectural Coatings): All application of architectural coatings shall adhere to Rule 1113 requiring the use of low VOC coatings.

AQ-4 Tier 4 Off-Road Emission Standards: requires that all construction equipment meet or exceed the California Air Resources Board (CARB) and U.S. Environmental Protection Agency (USEPA) Tier 4 off-road emissions standards for equipment rated at 50 horsepower or greater during Project construction.

2.4.8 Significance After Mitigation

All thresholds are considered less than significant and do not require mitigation measures. The "mitigation measures" provided in Section 2.4.7 are standard requirements that serve to further reduce emissions associated with the proposed Project. Impacts are less than significant.

2.4.9 Cumulative Impacts

Project-related cumulative impacts are addressed below and in Section 2.4.6.b, above.

The SSAB is designated as nonattainment under both the CAAQS and the NAAQS for ozone and PM_{10}. Emissions of CO, NOx, and ROG that exceed the SCAQMD operational thresholds would contribute to the ozone nonattainment designation, while emissions of PM_{10} that exceed the SCAQMD thresholds would contribute to the PM_{10} nonattainment designation of the SSAB.

Cumulative potential impacts to air quality are assessed on a regional scale given the dispersing nature of pollutant emissions and aggregate impacts from surrounding jurisdictions and air management districts. Any activity resulting in emissions of PM_{10}, ozone, or ozone precursors will contribute, to some degree, to regional non-attainment designations of ozone and PM_{10}. However, the level of cumulative impact a single project may have on regional air quality is difficult to measure.

The Coachella Valley is subject to the SCAQMD 2016 Air Quality Management Plan and the 2003 PM_{10} Coachella Valley State Implementation Plan (CVSIP) to ensure levels of criteria pollutants are regulated and minimized to the best of the region's ability. The 2016 AQMP has set forth attainment deadlines and future emission level projections for criteria pollutants within the project area, which satisfy Section 15130(b)(1)(B) of the CEQA guidelines for analyzing cumulative impacts. These regional plans provide guidelines and rules for achieving state and federal air quality standards, which aim to reduce cumulative impacts, particularly through the enforcement of SCAQMD daily thresholds and implementation of time-sensitive reduction strategies to achieve attainment status.

Regulation of Ozone

As previously discussed, SCAQMD studies indicate that most ozone is transported to the Salton Sea Air Basin from the upwind sources in the South Coast Air Basin. The amount of ozone contributed from other air basins is difficult to quantify; however, improved air quality in the project area depends upon reduced ozone emissions in the South Coast Air Basin. Therefore, cumulative impacts to ozone are better managed on a multi-region scale as opposed to single projects. The SCAQMD 2016 AQMP provide current and future management and control measures to reduce both stationary and mobile source ozone emissions. Proposed measures to reduce ozone include emission reductions from coatings and solvents, early transitions to cleaner mobile technologies, and incentives to adopt net zero and near zero technologies.[8]

CalEEMod does not calculate ozone emissions directly and therefore emissions of ozone precursors (CO, NOx, and ROG) were evaluated to determine potential Project-related impacts to ozone. Ozone precursors are the primary pollutants involved in the chemical reaction process that forms ozone. The proposed Project will not exceed thresholds for CO, NOx, or ROG during construction or operation. Therefore, cumulative impacts associated with ozone emissions are considered less than significant.

Regulation of PM_{10}

Similar to ozone, PM_{10} is regulated through the SCAQMD 2016 Air Quality Management Plan and 2003 PM_{10} Coachella Valley State Implementation Plan (CVSIP). Additional PM_{10} reduction measures include applicable state code and AQMD Rules, such as Rule 403 (Fugitive Dust), which enforces fugitive dust compliance for all activities within the SSAB. As shown in Section 2.4.6.b, the proposed Project will not exceed local daily thresholds for PM_{10} during construction or operation. Therefore, impacts to PM_{10} are considered less than cumulatively considerable.

[8] Final 2016 Air Quality Management Plan, South Coast Air Quality Management District, 2016.

2.5 Biological Resources

2.5.1 Introduction

The follow provides an overview of the existing biological resource conditions within the Project area and surrounding region and an analysis of potential biological resource impacts that would result from implementation of the Proposed Project. The regulatory environment and thresholds of significance are described. The Project's potential biological impacts are discussed, and mitigation measures are set forth, as necessary. The section concludes with a discussion of residual and cumulative impacts. This section is based in part on the Coachella Valley Multiple Species Habitat Conservation Plan (CVMSHCP), a comprehensive plan to conserve biological resources in the Coachella Valley developed with the best science available using a multitude of methods including literature review and field surveys.

2.5.2 Thresholds of Significance

The following significant thresholds or criteria are not strictly those recommended in §15064.7 of CEQA, rather they are derived from Appendix G of CEQA, which is used to determine if and to what extent a project may have a potentially significant impact on biological resources. The Proposed Project would have a significant effect on biological resources if it is determined that the project will:

a) Have a substantial adverse effect, either directly or indirectly, or through habitat modifications, on any species identified as a candidate, sensitive, or special status species (including species listed as threatened or endangered) in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service.

b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service.

c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.

d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.

e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.

f) Conflict with the provisions of any adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional or state habitat conservation plan.

2.5.3 Regulatory Framework

Federal

Endangered Species Act (ESA)

The United States Fish and Wildlife Service (USFWS) and the National Marine Fisheries Service are the designated federal agencies accountable for administering the ESA. ESA defines a species as "endangered" or "threatened" and provides regulatory protection at the federal level. Section 9 of the ESA prohibits the "take" of listed (i.e., endangered or threatened) species. The ESA definition of take is "to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, collect, or attempt to engage in such conduct."

Recognizing that take cannot always be avoided, Section 10(a) includes provisions for take that is incidental to, but not the purpose of, otherwise lawful activities. Specifically, Section 10(a)(1)(A) permits (authorized take permits) are issued for scientific purposes. Section 10(a)(1)(B) permits (incidental take permits) are issued for the incidental take of listed species that does not jeopardize the species. Section 10(a) of the ESA also establishes standards for the content of habitat conservation plans, such as the Coachella Valley Multiple Species Conservation Plan (CVMSHCP).

Section 7 (a)(2) requires federal agencies to evaluate a proposed Project with respect to species currently listed or proposed to be listed, and their respective critical habitat (if applicable). Federal agencies must employ programs for the conservation of listed species and are prohibited from authorizing, funding, or carrying out any action that would jeopardize a listed species or destroy or modify its critical habitat.

As defined by the ESA, "individuals, organizations, states, local governments, and other non-federal entities are affected by the designation of critical habitat only if their actions occur on federal lands, require a federal permit, license, or other authorization, or involve federal funding." The subject Project does not have a nexus with federal lands, a federal permit or other authorization, or federal funding.

Migratory Bird Treaty Act (MBTA)
Treaties signed by the U.S., Great Britain, Mexico, Japan, and the countries of the former Soviet Union make it unlawful to pursue, capture, kill, or possess, or attempt to engage in any such conduct to any migratory bird, nest, egg or parts thereof listed in this document. As with the ESA, the MBTA also allows the Secretary of the Interior to grant permits for the incidental take of these protected migratory bird species.

Section 404 of the Clean Water Act
This section of the Clean Water Act (CWA), administered by the US Army Corps of Engineers (USACE), regulates the discharge of dredged and fill material into "Waters of the United States" (WOTUS). The USACE has created a series of permits that authorize certain activities within waters of the U.S. The USACE delineates non-wetland waters in the Arid West Region by identifying the ordinary high water mark (OHWM) in ephemeral and intermittent channels (USACE, 2008a). The OHWM is defined in 33 CFR 328.3(e). The subject Project site is not located within or near federal jurisdictional waters and therefore no CWA 404 permit is required.

Wetlands and Other Special Aquatic Sites
Wetlands are defined at 33 CFR 328.3(b) as "those areas that are inundated or saturated by surface or ground water at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions. Wetlands generally include swamps, marshes, bogs, and similar areas." Special aquatic sites are geographic areas, large or small, possessing special ecological characteristics of productivity, habitat, wildlife protection, or other important and easily disrupted ecological values. There are no wetlands or special aquatic sites within or near the subject property, the nearest jurisdictional waters being within the Whitewater River located 6,000± feet south of the Project site.

State

California Endangered Species Act (CESA)
This legislation is similar to the federal ESA; however, it is administered by the California Department of Fish and Wildlife (CDFW). The CDFW is authorized to enter into "memoranda of understanding" with individuals, public agencies, and other institutions to import, export, take, or possess state-listed species for scientific, educational, or management purposes. CESA prohibits the take of state-listed species except as otherwise provided in state law. Unlike the federal ESA, CESA applies take prohibitions to species currently petitioned for state-listing status (candidate species). State lead agencies are required to consult with CDFW to ensure that actions are not likely to jeopardize the continued existence of any state-listed species or result in the destruction or degradation of occupied habitat.

The Native Plant Protection Act (NPPA)
California's NPPA includes measures to preserve, protect, and enhance rare and endangered native plant species. Definitions for "rare and endangered" are different from those contained in CESA. However, the list of species afforded protection in accordance with the NPPA includes those listed as rare and endangered under CESA. NPPA provides limitations on take of any rare or endangered native plants, except in accordance with the provisions outlined in the act. If a landowner is notified by CDFW, pursuant to the State Fish and Game Code Section 1903.5, that a rare or endangered plant is growing on their property, the landowner shall notify CDFW at least 10 days prior to the changing of land uses to allow CDFW to salvage the plants.

Natural Community Conservation Planning (NCCP) Program
California's NCCP program, which is managed by the CDFW, is intended to conserve multiple species and their associated habitats, while also providing for compatible use of private lands. Through local planning, the NCCP planning process is designed to provide protection for wildlife and natural habitats before the environment becomes so fragmented or degraded by development that species listing is required under CESA.

Instead of conserving small, often isolated "islands" of habitat for just one listed species, agencies, local jurisdictions, and/or other interested parties have an opportunity through the NCCP to work cooperatively to develop plans that consider broad areas of land for conservation that would provide habitat for many species. Partners enroll in the programs and, by mutual consent, areas considered to have high conservation priorities or values are set aside and protected from development. Partners may also agree to study, monitor, and develop management plans for these high value "reserve" areas. The NCCP provides an avenue for fostering economic growth by allowing approved development in areas with lower conservation value. An NCCP is included as a part of the CVMSHCP.

Sections 1600-1603 of the State Fish and Game Code
The California Fish and Game Code, Sections 1600 through 1603, regulates all diversions, obstructions, or changes to the natural flow or bed, channel, or bank of any river, stream, or lake that supports fish or wildlife resources. Under state code, CDFW jurisdiction is assessed in the field based on one, or a combination of criteria (CDFW 2005b). The Project will not affect natural drainages, streambeds or lakes, including those supporting sensitive fish and wildlife species.

Section 2081 of the State Fish and Game Code
Under Section 2081 of the California Fish and Game Code, the CDFW authorizes individuals or public agencies to import, export, take, or possess state endangered, threatened, or candidate species in California through permits or memoranda of understanding. These acts, which are otherwise prohibited, may be authorized through permits or memoranda of understanding.

State Fish and Game Code
Section 3505.5 makes it unlawful to take, possess, or destroy any birds in the order Falconiformes or Strigiformes (birds-of-prey, i.e.: owls, hawks, eagles, etc.) or to take, possess, or destroy the nest or eggs of any bird-of-prey. Section 3503 makes it unlawful to take, possess, or needlessly destroy the nest or eggs of any bird. Section 3513 makes it unlawful to take or possess any migratory nongame bird as designated in the MBTA.

Regional/Local

Coachella Valley Multiple Species Habitat Conservation Plan (CVMSHCP)
The Coachella Valley Multiple Species Habitat Conservation Plan (CVMSHCP) is a comprehensive regional plan encompassing a planning area of approximately 1.1 million acres and conserving approximately 240,000 acres of private land and being added to public lands already in conservation. In total, when fully implemented the CVMSHCP will conserve approximately 746,100 acres. Finalized in October 2008 and updated in 2016, the Plan addresses the conservation needs of a variety of plant and animal species, and plant communities that occur in the

Coachella Valley region, including endemic species that may still occur on the subject property. It establishes a system of preserves, generally outside of urbanized areas in the Valley in order to protect lands with high conservation value for 27 plant and wildlife species and 27 natural communities. The Plan streamlines development permit processing by providing "Permittees" "incidental take permits" under state and federal endangered species acts.

The City of Rancho Mirage is a signatory to and participates in the implementation of the CVMSHCP. The Proposed Project is located within the CVMSHCP planning area and is a "Covered Activity" as defined by the CVMSHCP. As a "Covered Activity", potential project impacts to covered species would be accounted for and offset through payment of development impact fees for land disturbances that post-date 1996. As a Permittee under the CVMSHCP, City of Rancho Mirage must comply with all applicable terms and conditions of the CVMSHCP and Implementing Agreement (See Section 13.0 of the CVMSHCP Implementing Agreement).

Rancho Mirage General Plan

Chapter 5 (Conservation + Open Space Element) of the Rancho Mirage General Plan includes the following policies pertaining to biological resources:

- **Policy COS 3.1** The City shall support and participate in local and regional efforts to evaluate and protect natural habitats, including suitable habitats for rare and endangered species occurring in Rancho Mirage and vicinity.

- **Policy COS 3.2** The City shall encourage and promote an understanding and appreciation of sensitive biological resources in Rancho Mirage and the vicinity.

- **Policy COS 3.3** The City shall encourage the use of naturally occurring desert plant materials in landscaping for development projects, to the greatest extent possible, and discourage the use of non-native plant materials that are harmful to native plant and animal species.

2.5.4 Environmental Setting

The City of Rancho Mirage and the Coachella Valley are located in the Colorado subunit of the Sonoran Desert. The rocky slopes and mountain ranges bordering the valley isolate it from marine moisture to the west. These circumstances contribute to the region's excessively hot and dry climate and create a unique geomorphic and geographic setting that has shaped the evolution of many diverse and occasionally highly specialized plant and wildlife species as well as natural communities.

A wide range of common plant species, such as mesquite, smoke tree, desert holly, creosote bush, and palo verde, are supported by the conditions present in the valley. A wide range of wildlife species, including those endemic to the valley are present, and some have been listed as threatened or endangered by federal and state agencies. Regional sensitive wildlife species include the Coachella Valley fringe-toed lizard, Peninsular bighorn sheep, Casey's June beetle, arroyo southwestern toad, and mountain yellow-legged frog. Several sensitive bird species are found in the valley, including the Least Bell's vireo and southwestern flycatcher, both listed as endangered. Plant species that are federally listed as endangered include the Coachella Valley milkvetch and triple-ribbed milkvetch.

2.5.5 Existing Conditions

The Project site encompasses 26.22± acres and consists of the existing Hazelden Betty Ford Campus and 6.53± acres of undeveloped and largely undisturbed land on the east and extending to Visa Del Sol. The Project site is located in the urban area of the City of Rancho Mirage and surrounded by primarily residential and institutional lands and developments. Lands east and north of the Project site include vacant one and five-acre parcels, several

having been subdivided into one-acre lots. Lands to the north and west of the Project site are part of the Eisenhower Medical Center (EMC) campus and are developed except for a vacant parcel on the northeast corner. The Rancho Mirage Country Club is located farther north across the EMC Emergency Room Access Rd, and consists of residential and golf course developments.

The Project site is bordered on the east by Vista Del Sol. South of the western portion of the subject property is the Wilshire Palms residential condominium development, while to the east is a vacant four-lot one-acre subdivision that extends along the Project's southern border to Vista Del Sol. Biological resources in the project area have been affected by extensive urban development and habitat fragmentation, sand field stabilization, area roadways and traffic, and introduced plant and animal species. Native habitat has been eliminated from all but the eastern undeveloped portion of the subject property, which retains native soils and sparse vegetation of the desert scrub community dominated by creosote bush (*Larrea tridentata*) and annual plants.

The Project site is within the boundaries of the CVMSHCP/NCCP but is not within any designated Conservation Area.

Soils

According to the USDA online Web Soil Survey[1], the Project site contains two distinct types of soils (see Exhibit 2.7-2, Soil Types):

- Myoma fine sand (MaB) – A nearly level soil (0 to 5 percent slopes) that is found on alluvial fans, lacustrine basins, and flood plains of the Coachella Valley. This soil type is found on a strip of land on the south boundary of the Project site.

- Myoma fine sand (MaD) – A moderately sloping to rolling soil (5 to 15 percent slopes) that is found on dunes and alluvial fans. This soil type is found on nearly all of the Project site, except the existing retention pond and the southern edge.

Vegetation Communities and Flora Species

The Project site contains fully developed areas and approximately 6.553 acres of undeveloped stabilized/ shielded sand fields based on the Natural Communities Maps developed for CVMSHCP. The sparse vegetation that occurs on the undeveloped portions of the subject property is a desert scrub community dominated by creosote bush (*Larrea tridentata*) and annual plants. Coachella Valley milkvetch (*Astragalus lentiginosus var. coachellae*) is a Covered Species under CVMSHCP associated with stabilized shielded desert sand fields and is federally listed as endangered[2]. As noted, sand fields and hummocks where milkvetch could occur have been developed, stabilized by adjacent and especially upwind development, and fragmented by urbanization. Other impacts to the species are from increased human activity, including OHV use, trampling, and the introduction of non-native plants, including Russian thistle (*Salsola tragus*) found on site, and other invasive plants. Milkvetch was not described in the floral and faunal compendium prepared for the subject property in 1992[3] and has a low probability of occurring on the subject property due to the disruption of ecological processes that provide habitat for this plant.

1 USDA Web Soil Survey (https://websoilsurvey.sc.egov.usda.gov/App/WebSoilSurvey.aspx), accessed December 17, 2019.

2 Coachella Valley Multiple Species Habitat Conservation Plan (CVMSHCP), P.9-26.

3 "Floral and Faunal Compendium" prepared for the Eisenhower Medical Center Specific Plan # 2, prepared by Michael Brandman and Associates 1992.

Wildlife

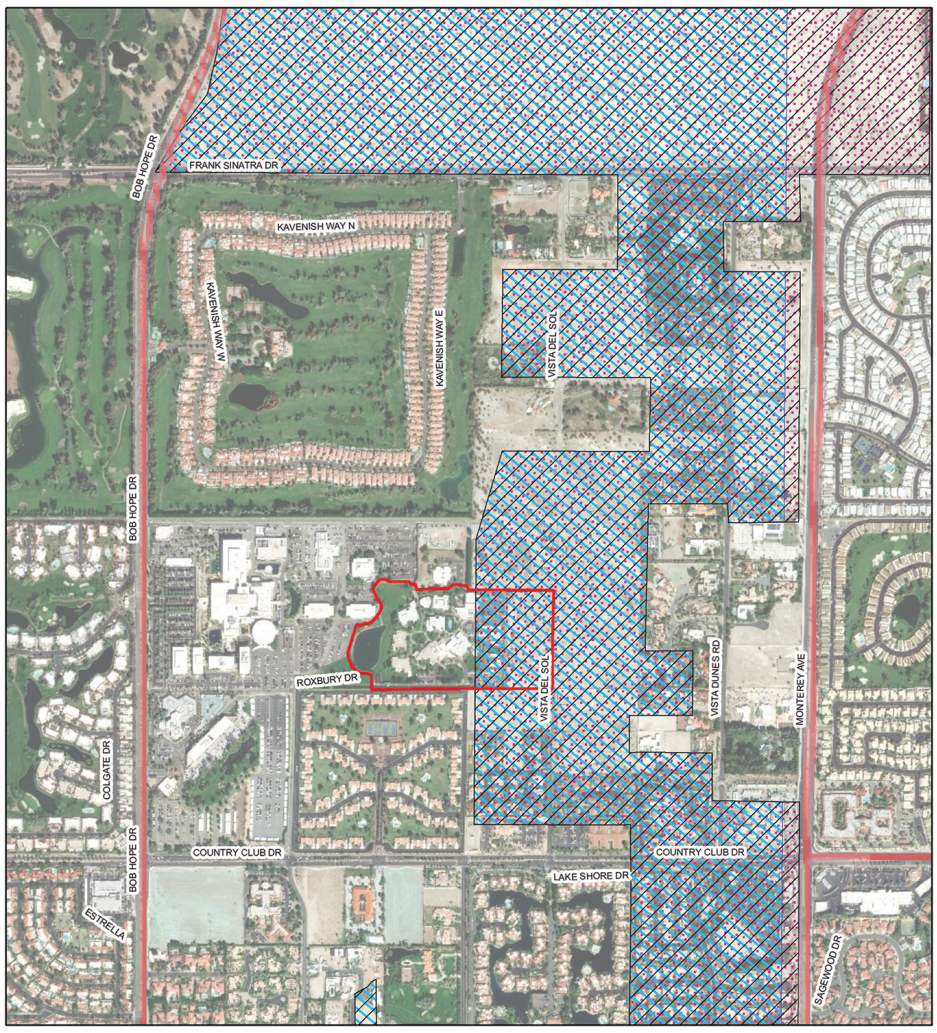
Several Covered Species under the MSHCP associated with stabilized shielded desert sand dunes and fields may have the potential to occur on the undeveloped parcel of the subject property[4] [5]. Reptile species include the flat-tailed horned lizard (*Phrynosoma mcallii*), a species of special concern and Coachella Valley fringe-toed lizard (*Uma inornata*) listed as federally threatened and state endangered. Insect species include the Coachella Valley giant sand-treader cricket (*Macrobaenetes valgum*) and Coachella Valley Jerusalem cricket (*Stenopelmatus cahuilaensis*). Both mammal species are of special concern and include the Coachella Valley round-tailed ground squirrel (*Spermophilus tereticaudus chlorus*) and Palm Springs pocket mouse (*Perognathus longimembris bangsi*). Le Conte's thrasher (*Toxostoma lecontei*), a bird species of special concern, may also be associated with this natural community.

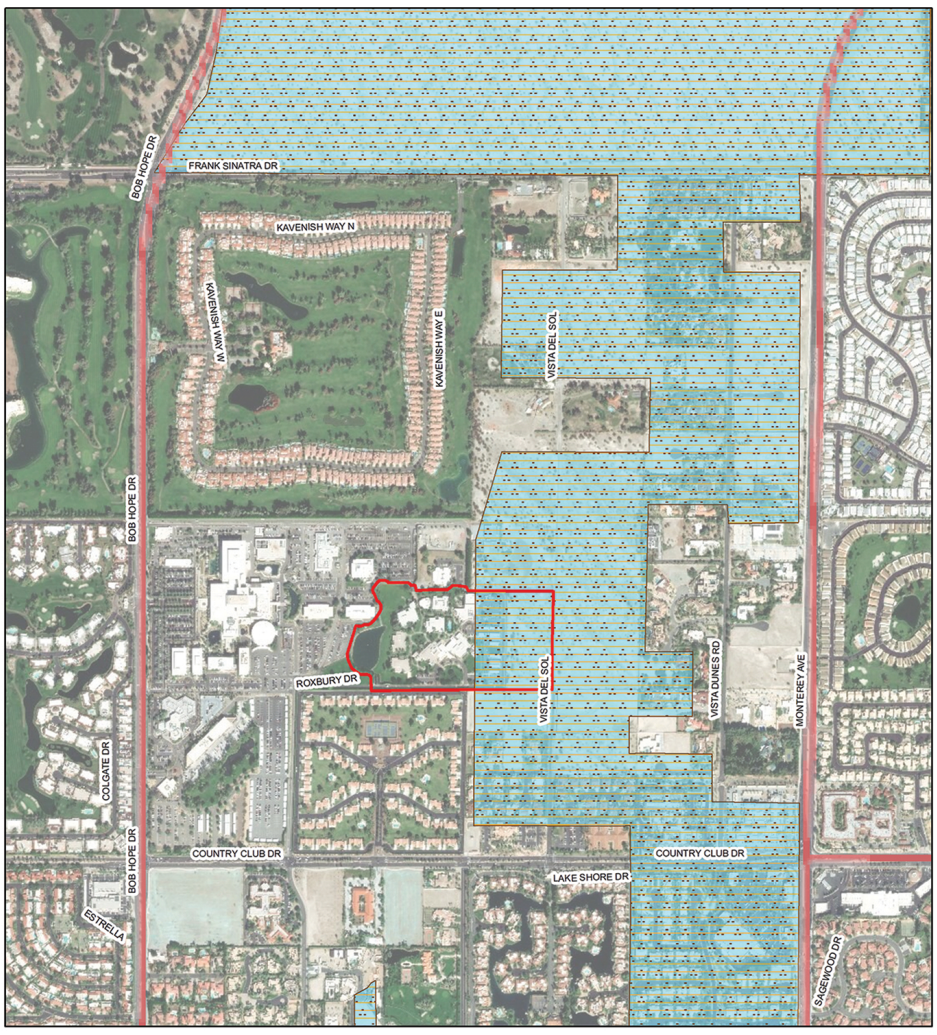
Sensitive Species

The classification of "sensitive" is given to species which are typically rare or have been locally depleted and are vulnerable due to human activities. While a sensitive species may not be significantly threatened, it is considered at risk and is often a candidate for future listing. As noted above, the Coachella Valley is home to a wide range of sensitive biological resources, including plant and animal species that are endemic to the region. The continued conversion of natural habitats within the region to other land uses and the resulting reduction in acreage and the ecological processes of those available habitats has placed many species at the brink of extinction. Due to the loss of viable habitat, some of these species have been listed as threatened or endangered by federal and State agencies. "Endangered" species are those with such limited numbers that they are considered in imminent danger of extinction, while "threatened" species are those that are likely to become endangered, particularly on a local scale, within the foreseeable future.

While some sensitive species may occur in the Project area, it is of low conservation value given only fragmented habitats are present with sparse vegetation of a single type. Upwind obstructions have cut off the active sand dunes and fields that previously occurred on these lands and their habitat value and suitability has been altered. Similar habitats of high conservation values that support multiple Covered Species are conserved through CVMSHCP; for example, approximately 1,591 acres of stabilized shielded desert sand fields are mapped in the Whitewater Floodplain Conservation Area, and approximately 1,513 acres of this natural community will be protected by meeting the Conservation Objectives for sand transport[6].

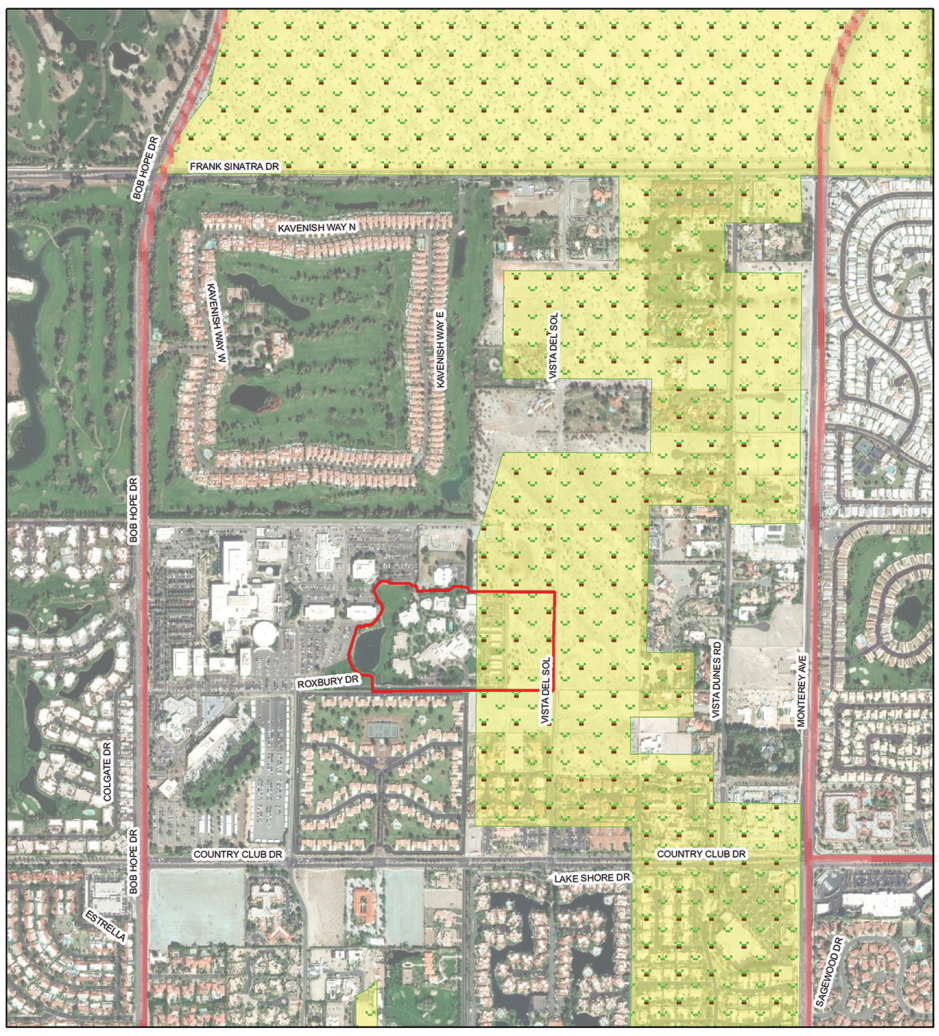
[4] Coachella Valley Multiple Species Habitat Conservation Plan (CVMSHCP), P.10-35 & Figure 3-1.
[5] Op. cit. Brandman 1992.
[6] Coachella Valley Multiple Species Habitat Conservation Plan (CVMSHCP), P.10-33.

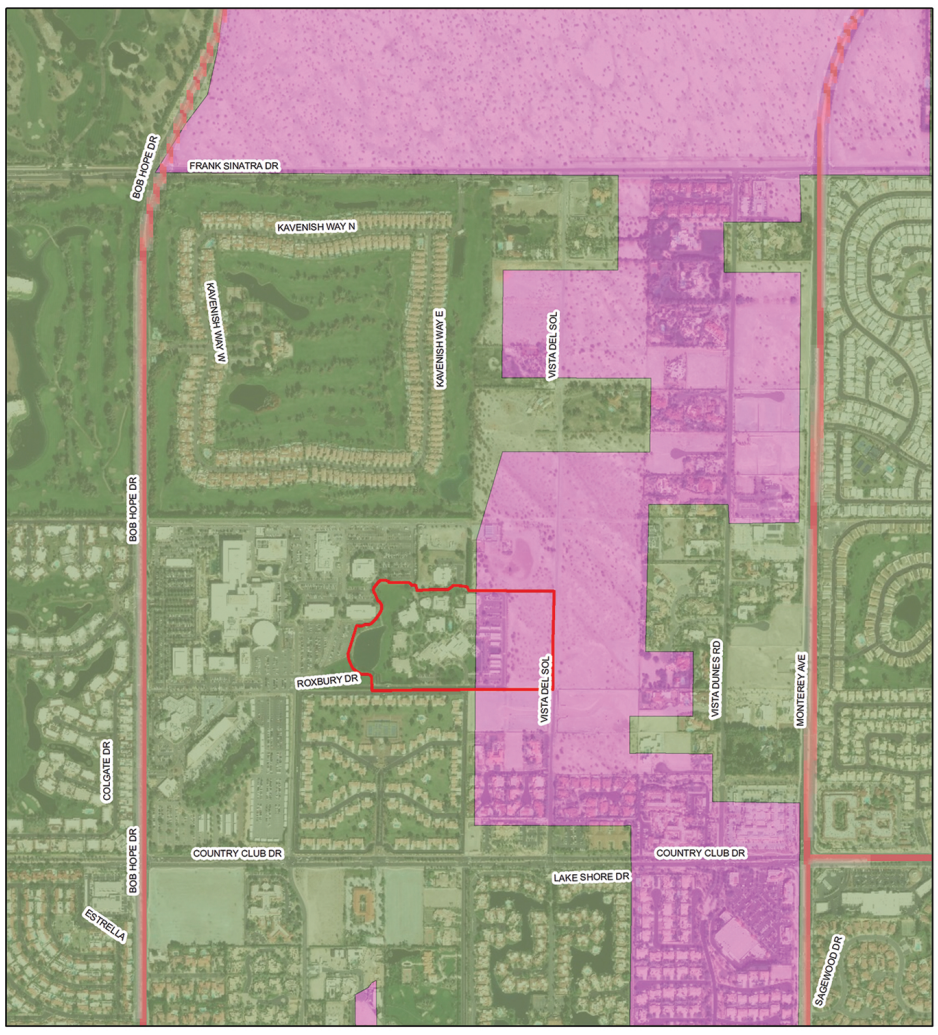




- Fringe-toed Lizard
- Jerusalem Cricket
- Flat-tailed Horned Lizard

- Giant Sand-treader Cricket
- Coachella Valley Milkvetch
- LeConte's Thrasher





- Round-tailed Ground Squirrel
- Palm Springs Pocket Mouse

Vegetation Type

- Stabilized shielded sand fields
- Urban

PROJECT SITE

0 500 1,000 2,000 Feet

N

01.23.20

Source: CVMSHCP, 2008; Esri 2020

TERRA NOVA®
PLANNING & RESEARCH, INC.

Hazelden Betty Ford Center PDP EIR
MSHCP Composite Species/Vegetation Communities Map
Rancho Mirage, California

Hazelden Betty Ford Foundation

Exhibit
2.5-1

2.5.6 Project Impacts

a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

Less Than Significant with Mitigation. Biological resources and habitat in the project area have been affected by extensive urban development, area roadways, and traffic. Native habitat has been eliminated from all but the eastern undeveloped portion of the subject property, which retains native soils and sparse vegetation of the desert scrub community dominated by widely spaced creosote bush (*Larrea tridentata*) and annuals. Based on a literature review of known biological resources in the project area and the site's location adjacent to a local roadway, the Project has minimal potential to substantially affect sensitive biological resources.

The proposed improvements would occur within the CVMSHCP planning area and the subject Project is a "Covered Activity" as defined by the CVMSHCP. As a "Covered Activity", potential project impacts to covered species have been accounted for and offset through payment of development impact fees for land disturbances that post-date 1996. The applicant will also be required to pay a per acre development impact fee for disturbance of currently vacant and undeveloped lands. In conjunction with compliance with the MBTA and payment of impact mitigation fees, the Project is expected to have a less than significant effect on sensitive plant or wildlife species, federally listed species, state species of concern, or their habitats.

b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service.

Less Than Significant. The Proposed Project is located within an urban environment and is surrounded by developed and previously disturbed lands. There is no riparian habitat on the site or in the Project area. The Project site is comprised of desert scrub lands dominated by creosote bush and is a very common habitat type in the valley. The Project site is not known to contain any threatened, endangered, or rare species, or sensitive natural communities not already covered under the Coachella Valley MSHCP. Impacts to biological resources as a result of the Proposed Project are expected to be less than significant.

c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.

No Impact. Potential state and federal jurisdictional waters and wetlands within the City are limited to drainages within and adjacent to the Santa Rosa Mountains and along and within the Whitewater River Stormwater Channel, more than one mile south of the subject property. The Project site is not located near or within the vicinity of any of these potential wetland or riparian areas. Therefore, the project would have no impact on federally protected wetlands.

d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.

Less Than Significant With Mitigation. Primary movement and/or wildlife corridors in the Project area are limited to drainages of the Indio Hills to the north, the Santa Rosa Mountains to the south, and the Whitewater River Stormwater Channel. The project site is not located within or adjacent to a known wildlife corridor, and the movement of coyotes are not particularly impeded by existing conditions or the Proposed Project.

The Proposed Project is located within an urban environment and is surrounded by developed and previously disturbed lands. Existing conditions within the developed portion of the site include a variety of trees and shrubs that may serve as nesting sites and/or nurseries for a variety of bird species, including raptors and others protected by the State and/or the Migratory Bird Treaty Act (MBTA).

While portions of the site may be used by migratory bird species protected under the MBTA, due to surrounding human activity over many years, the site does not contain features that are suitable for a migratory wildlife corridor. Potential impacts to nesting birds, including burrowing owl, will be assessed through pre-construction nesting bird surveys and proper measures taken to avoid and minimize impacts pursuant to the MBTA (Mitigation Measure BIO-1 & BIO-2). However, given the context and existing conditions at the subject property, the Proposed Project is not expected to impede the use of a native wildlife nursery site. With the application of the aforementioned mitigation measures, impacts are expected to be less than significant on species movement, migratory corridors or native wildlife nursery sites.

e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.

No Impact. The Proposed Project will not interfere with any City policies regarding the preservation of plants or animals. The Project is a "Covered Activity" under the CVMSHCP and development mitigation fees will be collected prior to new ground disturbance to mitigate for potential Project impacts and to further the implementation of the CVMSHCP. The proposed landscaping includes several Coachella Valley native species as recommended in CVMSHCP; none of the prohibited invasive plant species listed in the MSHCP have been included. The Proposed Project would also adhere to the Rancho Mirage General Plan Policy COS 3.3 by using naturally occurring desert plant materials in landscaping and avoiding the use of non-native plant materials that are harmful to native plant and animal species.

f) Conflict with the provisions of any adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional or state habitat conservation plan.

No Impact. The City of Rancho Mirage is a participant in the CVMSHCP (and its associated Natural Community Conservation Plan), and the Project will adhere to the requirements of the Plan. As proposed, the Project is a "Covered Activity" under the CVMSHCP and thus does not conflict with the CVMSHCP.

2.5.7 Mitigation Measures

As noted above, the Project's potential impacts to sensitive biological resources is expected to be less than significant. To further ensure that impacts are kept below a level of significance, the Project shall comply with the following mitigation measures.

BIO-1 Payment of CVMSHCP Fees
Prior to the issuance of grading permits or other site-disturbing authorizations for currently undisturbed lands, the Project proponent shall pay the CVMSHCP local development mitigation fee to mitigate for impacts to covered species and natural communities within the Project site.

BIO-2 MBTA Compliance
For any grading or other site disturbance or tree or vegetation removal occurring during the nesting season between February 1st and August 31st, a qualified biologist shall conduct at least one nesting bird survey, and more if deemed necessary by the consulting biologist, immediately prior to initiation of project-related ground disturbing activities. If nesting birds are present, including but not limited to burrowing owl, no work shall be permitted near the nest until the young birds have fledged. While there is no established protocol for nest avoidance, when consulted, the CDFW generally recommends avoidance buffers of about 500 feet for birds-of-prey, and 100 – 300 feet for songbirds.

BIO-3 If burrowing owls are detected during the pre-construction MBTA nesting bird survey, the applicant shall have the undeveloped portions of the subject property surveyed in a manner consistent with the CDFW Burrowing Owl Survey Protocol including the following:

A "take avoidance survey" for the burrowing owl no less than 14 days (in accordance with the Staff Report on Burrowing Owl Mitigation [CDFW 2012]) and no more than 30 days prior to groundbreaking activities are required within and outside of project areas that contain suitable habitat for this species. Additionally, a final survey must be conducted within 24 hours of the initiation of ground disturbance activities in accordance with the CDFW 2012 protocol.

a. If no burrowing owls are detected during those surveys, implementation of ground disturbance activities could proceed without further consideration of this species assuming there is no lapse between the surveys and construction as the protocol states "time lapses between Project activities trigger subsequent take avoidance surveys including but not limited to a final survey conducted within 24 hours prior to ground disturbance."
b. If burrowing owls are detected during the take avoidance surveys, avoidance and minimization measures would then be required and could include the establishment of a buffer zone, the passive or active relocation of the individual(s) or other measures approved by the CDFW.

2.5.8 Significance After Mitigation

Impacts to biological resources associated with the Proposed Project will be reduced to a less than significant level by adherence to the mitigation measures set forth above.

2.5.9 Cumulative Impacts

Using the summary of projections method to analyze cumulative impacts set forth in State CEQA Guidelines Section 15130 (b)(1)(B), impacts have been assessed on both a regional and local level. The primary document used to determine cumulative impacts was the CVMSHCP, which was designed for the long-term protection and regulation of biological resources in the Project area.

The Project site is not within any CVMSCHP designated Conservation Area and does not contain any wildlife movement corridors or linkages. It does not contain any riparian areas or jurisdictional water features. The site consists of developed and undeveloped areas and is largely surrounded by urban development. Onsite habitat quality suggests low potential for it to sustain populations of sensitive species. As described above, potential impacts to biological resources will be mitigated to less than significant levels. Therefore, the Project's impacts to biological resources will be less than significant, and the Project's contribution to cumulative impacts will not be cumulatively considerable.

2.6 Cultural and Tribal Cultural Resources

2.6.1 Introduction

This section evaluates the potential for the proposed Project to result in adverse impacts to cultural resources. Cultural resources include Native American tribal cultural resources, unique paleontological or geological resources, archaeological resources, historic architectural resources, and human remains. Mitigation measures to reduce impacts to a less than significant level are identified, where appropriate. This section is based primarily on the Historical/Archaeological Resources Survey report prepared for the Project by CRM TECH (2019)[1], which is Appendix A of this EIR and is available for review by qualified professionals.

2.6.2 Thresholds of Significance

Cultural Resources

According to Appendix G of the CEQA Guidelines, the Project would have a significant effect on cultural resources if it would:

a) Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5.

b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5.

c) Disturb any human remains, including those interred outside of dedicated cemeteries.

Tribal Cultural Resources

According to recent Appendix G of the CEQA Guidelines, the Project would have a significant effect on tribal cultural resources if it would:

a) Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

   i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or

   ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

[1] "Historical/Archaeological Resources Survey: The Hazelden Betty Ford Center Reconfiguration Project", prepared by CRM TECH, December 14, 2019.

2.6.3 Regulatory Framework

Federal

National Historic Preservation Act

The National Historic Preservation Act (NHPA) was established in 1966 by the Advisory Council on Historic Preservation (ACHP) with the goal to encourage federal agencies to factor historic preservation into federal project requirements. ACHP is an independent federal agency that promotes the preservation, enhancement, and productive use of the nation's historic resources, and advises government leaders on national historic preservation policy. The ACHP defines "historic properties" as "any prehistoric or historic district, site, building, structure, or object included in, or eligible for inclusion in, the National Register of Historic Places."

Section 106 of the NHPA applies when two thresholds are met: 1) there is a federal or federally licensed action, including grants, licenses, and permits, and 2) that action has the potential to affect properties listed in or eligible for listing in the National Register of Historic Places. Section 106 requires each federal agency to identify and assess the effects of its actions on historic resources. If it is determined that a proposed action has the potential to affect historic properties, the federal agency must identify the appropriate State Historic Preservation Officer/Tribal Historic Preservation Officer (SHPO/THPO) to consult with during the process.

National Register of Historic Places

Authorized under the NHPA, the National Register of Historic Places is the nation's official list of cultural resources that qualify for preservation. Properties listed in the Register include districts, sites, buildings, structures, and objects that are significant in American history, architecture, archaeology, engineering, and culture. The following criteria are used to determine eligibility for inclusion in the National Register. These criteria have been developed by the National Park Service as provided for in the NHPA:

a) Are associated with events that have made a significant contribution to the broad patterns of our history;
b) Are associated with the lives of persons significant in our past;
c) That embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or
d) That yielded, or may be likely to yield, information important in prehistory or history (36 CFR 60.4).

No historic properties listed in or eligible for listing in the National Register of Historic Places were identified or known to occur in the Project vicinity. The proposed Project does not have a federal nexus nor any potential to affect historic properties; therefore, the Project would not be subject to NHPA.

State

California Public Resources Code

The California Environmental Quality Act (CEQA) is the principal statute governing the environmental review of projects within the State. The State of California's Public Resources Code (PRC) establishes the definitions and criteria for "historical resources," which require similar protection to what the NHPA mandates for historic properties. According to PRC Section 5020.1(j), an "historical resource includes, but is not limited to, any object, building, site, area, place, record, or manuscript which is historically or archaeologically significant, or is significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California."

If a lead agency determines that an archaeological site is an historical resource, the provisions of PRC Section 21084.1 and CEQA Guidelines Section 15064.5 would apply. If an archaeological site does not meet the CEQA Guidelines criteria for a historical resource, then the site may meet the threshold of PRC Section 21083 regarding unique archaeological resources.

In addition, PRC Section 5097.98 states that if Native American human remains are identified within a project area, the landowner must notify and consult with the Native American Most Likely Descendant (MLD), as identified by the NAHC, to develop a plan for proper treatment and/or removal of the human remains and associated burial of artifacts. These procedures are also addressed in Section 15046.5 of the CEQA Guidelines and within the California Health and Safety Code (see discussion below).

Assembly Bill 52

Assembly Bill (AB) AB 52 was passed by the California Legislature and signed into law by the Governor in 2015. It established a new category of resources in the California Environmental Quality Act called Tribal Cultural Resources. (Public Resources Code § 21074.) "Tribal cultural resources" are either of the following:

(1) Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either of the following:

(A) Included or determined to be eligible for inclusion in the California Register of Historical Resources.
(B) Included in a local register of historical resources as defined in subdivision (k) of Section 5020.1.

(2) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Section 5024.1. In applying the criteria set forth in subdivision (c) of Section 5024.1 for the purposes of this paragraph, the lead agency shall consider the significance of the resource to a California Native American tribe.

AB 52 establishes a formal project consultation process for California Native American tribes and lead agencies regarding tribal cultural resources, referred to as government-to-government consultation. Per Public Resources Code Section 21080.3.1.(b), the AB52 consultation process must begin prior to release of an environmental impact report, mitigated negative declaration, or negative declaration. Native American tribes to be included in the formal consultation process are those that have requested notice of projects proposed within the jurisdiction of the lead agency.

California Register of Historical Resources

For CEQA purposes, "historical resources" applies to any such resources listed in or determined to be eligible for listing in the California Register of Historical Resources, included in a local register of historical resources, or determined to be historically significant by the Lead Agency (Title 14 CCR Section 15064.5(a)(1)-(3)). CEQA guidelines mandate that "generally a resource shall be considered by the lead agency to be 'historically significant' if the resource meets the criteria for listing on the California Register of Historical Resources" (Title 14 CCR Section 15064.5(a)(3)). A resource may be listed in the California Register if it meets any of the following criteria:

a) Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage.
b) Is associated with the lives of persons important in the State's past.
c) Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values.
d) Has yielded, or may be likely to yield, information important in prehistory or history. (Public Resources Code section 5024.1(c))

California Health and Safety Code

The California Health and Safety Code Section 7050.5 regulates the treatment of human remains. According to the Code, in the event of discovery or recognition of any human remains in any location other than a dedicated cemetery, there shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains until the coroner of the county in which the human remains are discovered has

determined that the remains are not subject to further investigation. If the coroner recognizes or has reason to believe that the human remains are those of a Native American, he or she shall contact the NAHC to determine the Most Likely Descendant (MLD). Consultation with the designated MLD will determine the final disposition of the remains.

Local

Rancho Mirage General Plan

The City of Rancho Mirage General Plan sets forth goals, policies, and programs that preserve important cultural resources in the Archaeological and Historic Resources section of the Conservation and Open Space Element. Relevant policies include the following:

- **Policy COS 8.1** The City shall exercise its responsibility to preserve archaeological, historical, and cultural sites.
  Program COS 8.1A
  Establish and maintain an archaeological and historical resources database.
  Program COS 8.1B
  Maintain a preservation ordinance to provide for the designation and protection of historic resources.

- **Policy COS 8.2** Development or land use proposals that have the potential to disturb or destroy sensitive cultural resources shall be evaluated by a qualified professional and appropriate mitigation measures shall be incorporated into project approvals, if necessary.
  Program 2.C
  Continue to adhere to the requirements of SB 18 of 2004 and AB 52 of 2014, as applicable, by consulting with local Native American tribes on potential disturbance, recovery, and preservation of tribal cultural resources.

2.6.4 Environmental Setting

Prehistoric Period

The City of Rancho Mirage and the Coachella Valley are in the western end of the Colorado Desert. The earliest time period of human occupancy is arguably the Paleoindian (ca. 8,000 to 10,000-12,000 years ago), when small groups of hunters and gatherers used very simple stone tools. The population dwindled in the Early Archaic Period (ca. 8,000 to 4,000-years ago) and seemed to leave very few archaeological remains. However, in the ensuing Late Archaic Period, small groups relied on opportunistic hunting and left prominent groundstone artifacts for food processing. The hunting livelihood continued into the Late Prehistoric Period (ca. 1500 years ago to the Spanish missions era), when ceramics and the bow/arrow were introduced into the region.

The Cahuilla

The Cahuilla people settled in the Coachella Valley centuries ago and lived on hunting and gathering under varying environmental conditions. They are generally divided into three groups by geographic setting: the Pass Cahuilla of the San Gorgonio Pass – Palm Springs area, the Mountain Cahuilla of the San Jacinto and Santa Rosa Mountains and the Cahuilla Valley, and the Desert Cahuilla of the eastern Coachella Valley. Amid the desert and mountains, the Holocene Lake Cahuilla provided abundant resources to nearby settlements. The Cahuilla hunted waterfowl and utilized elaborate stone fish traps when the lake was present, and relied on more terrestrial resources when it desiccated in the lacustral cycle. They hunted deer, antelope, bighorn sheep, rabbits, and wood rats with throwing sticks, clubs, nets, traps, and snares, as well as bow and arrow. A variety of lithic tools such as mortar and pestle, fire drill, awl, stone knives and scrapers and containers like baskets and pottery vessels as well as wood, horn, and bone spoons and stirrers were employed in their subsistence.

The Cahuilla population prior to European contact is estimated to range from 3,600 to as high as 10,000 persons spanning over 2,400 square miles of territory. In the 19th century, the population was decimated due to European diseases against which the Native peoples had no immunity. Native Americans of Pass and Desert Cahuilla lineages lived on in the Coachella Valley and are mostly affiliated with the nearby Indian reservations such as Agua Caliente, Morongo, Cabazon, Torres Martinez, and Augustine.

Historic Period

In 1823, the first known group of European explorers traveled through the Coachella Valley mainly along established trails due to the harsh environment. Among these trails was the Cocomaricopa Trail, an ancient Indian trading route later named after William David Bradshaw, whom found the important route in 1862. The Bradshaw Trail mostly resembled the present-day Highway 111 in the route within Coachella Valley, and served as the main connection between coastal southern California and the Colorado River for a decade before the Southern Pacific Railroad came to completion in the 1870s. As railroad lines and stations were completed, non-Indian settlement arrived in the Coachella Valley and expanded in the next decade after the Homestead Act, the Desert Land Act, and other federal land laws that opened public land for claims. Agriculture became the dominant economic activity with the development of extensive groundwater resources (mainly artesian wells). From 1920s on, a new industry began to develop focusing on winter resorts, hotels and winter camps. By the middle of the 20th Century country clubs began to develop and have since spread throughout the Valley and made it a premier winter retreat in southern California.

The first settlement activities were noted in the 1910s-1920s in the Rancho Mirage area. The community gained its name in the 1930s and rapid growth after the WWII. Since the Thunderbird Country Club and the Tamarisk Country Club were developed in 1951-1952, Rancho Mirage has continued to grow into a high quality residential resort community with a cultural history of its own.

2.6.5 Existing Conditions

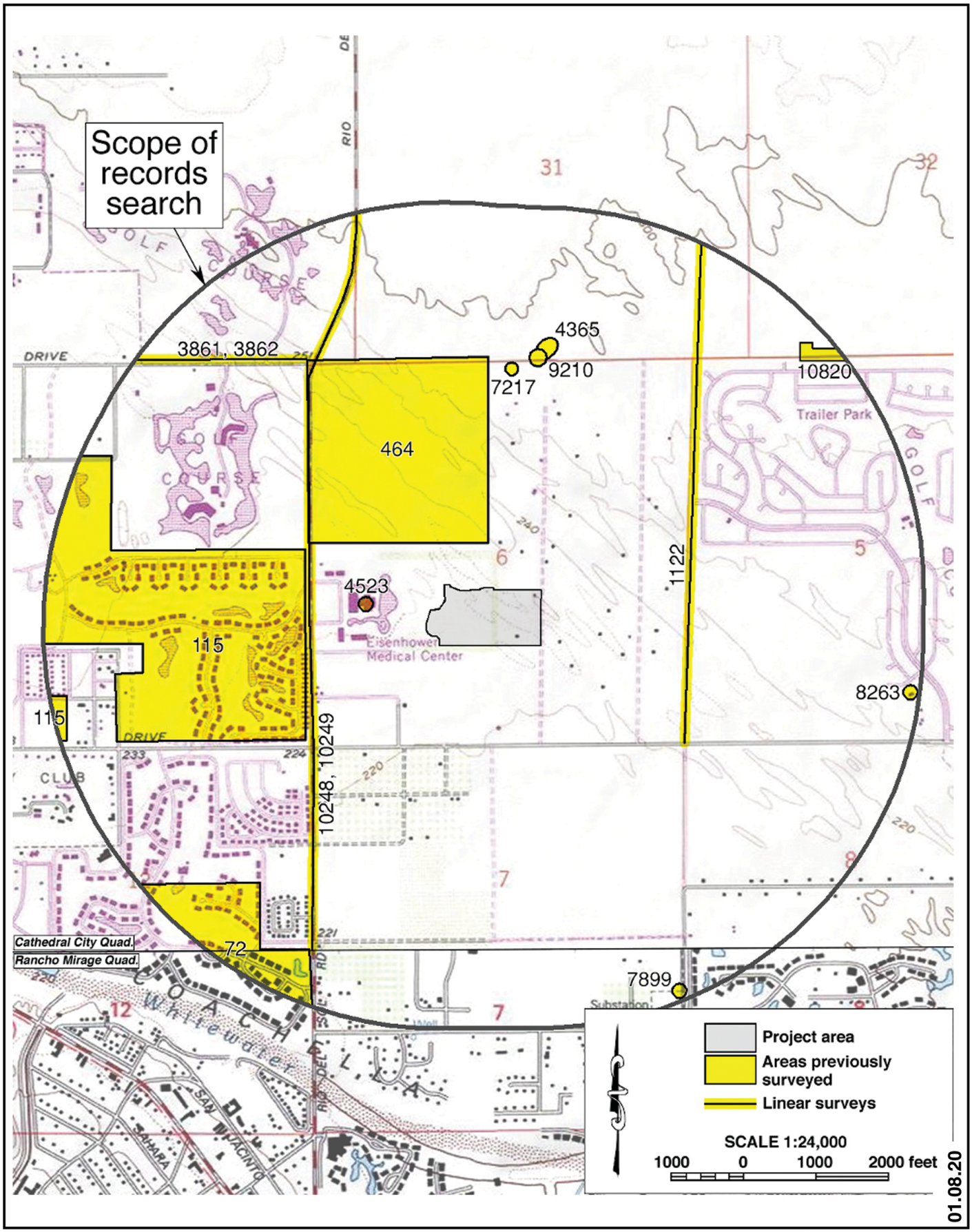
Historical Records Search and Background Research

On November 5, 2019, CRM TECH completed a records search at the Eastern Information Center (EIC), University of California, Riverside. The EIC is the State of California's official cultural resource records repository for the County of Riverside. The search was focused on a one-mile radius of the Project site and identified 15 previous cultural resources studies on nearby tracts of land (see Exhibit 2.6-1). Only one historic-period cultural resource (33-005636) has been recorded within one-mile radius of the Project site. Site 33-005636 is a single-family residence known as "Les Clancy's Rancho", built of local stone in 1932 and is located approximately 0.5 mile southwest of the Project site. Given the distance from the Project site, this cultural resource requires no further consideration as it will not be disturbed or impacted by the proposed Project.

Historical sources and literature research indicated no presence of settlement activities in the Project area until the mid-1950s. A couple residences were built following post-WWII streamlining of the Small Tract Act (1938) by private owners claiming five-acre homesteads; both were abandoned or demolished by the turn of century. The Project vicinity was largely vacant until the first building of the Eisenhower Medical Center opened in 1971. The building is listed in the City's 2003 Historic Resource Survey but not designated as an historic resource. The nearest designated historic resource is *Sunnylands Estate*, the desert home of Walter and Leonore Annenberg, which is located approximately one mile north of the Project site.

Field Survey

On November 19, 2019, a field survey was conducted by a CRM TECH archaeologist at the Project site to search for evidence of human activities dating more than 50 years. The field survey identified a foundation left by a demolished residence built in the 1950s, and the site was recorded into the California Historical Resources Inventory and designated Site 33-029012 (CA-RIV-012964) by the EIC. No other associated features or potential "historical resources" were encountered throughout the survey.



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Hazelden Betty Ford Center PDP EIR
Cultural Resource Surveys in Project Vicinity
Rancho Mirage, California

Hazelden Betty Ford Foundation

Exhibit
2.6-1

Table 2.6-1
Cultural Resources identified by field survey on the Project Site

Site Number/Trinomial Resource Description	Resource Description
33-029012 (CA-RIV-012964)	Demolished residence foundation and scattered refuse

Site 33-029012 occupies an area of approximately 80 feet by 65 feet in the northeastern corner of the Project area. The main feature of the site is a concrete slab foundation, approximately 28x28 feet in size with metal pipes embedded in it and nearby. The foundation is surrounded by scattered glass shards, metal cans, and building debris such as roof shingles, broken lumber, and rusted nails. The site is comprised of typical remains from residences built in the mid-20th century which were common in the southern California desert region. Historical background research has identified no persons or events of recognized historical significance in association with the site, nor does the foundation and remains recorded at the site demonstrate any particular merits in terms of design, construction, engineering, or aesthetics. Moreover, these features alone without a substantial artifact deposit from the late historic period, have little potential to yield important archaeological data. Therefore, Site 33-029012 does not appear eligible for listing in the California Register of Historical Resources, and thus does not meet CEQA's definition of a "historical resource."

Native American Participation

On November 5, 2019, CRM TECH submitted a written request to the State of California Native American Heritage Commission (NAHC) for a records search in the commission's Sacred Lands File. The NAHC search identified no Native American cultural resources in the Project area but recommended that CRM TECH contact local tribal authorities. Per NAHC's recommendation and previously established consultation protocol, CRM TECH sent written requests in November 2019 regarding the site to representatives and/or chairmen of 11 tribes. Five of the eleven tribes contacted responded in writing (see Appendix A). The Morongo Band of Mission Indians gave no additional comments but deferred to the Agua Caliente Band for further consultations under AB 52. The Agua Caliente Band stated that the Project area is within the Tribe's Traditional Use Area and requested a cultural resources survey of the Project site and a copy of relevant documentation, as well as tribal archaeological monitoring during construction. The Twenty-Nine Palms Band of Mission Indians also requested to review the cultural reports of the Project, would like the opportunity to have a tribal monitor on site during ground disturbance activities, and had no additional information on Native American cultural resources in the Project area. The Cabazon Band of Mission Indians and the Augustine Band of Cahuilla Indians had no specific information on Native American cultural resources in the Project area. During the Project, immediate notification of any discovery of such resources was requested by the Augustine Band.

2.6.6 Project Impacts

The proposed Project would update and modernize the developed portions of HBFC facilities in the City of Rancho Mirage, which currently consists of eight buildings plus ancillary structures, including residential treatment facilities, outpatient day-treatment facilities, and ancillary facilities (e.g. dining areas, pool and spa, administrative offices and covered and open parking). The Project would include the demolishing and replacement of four one-story residential buildings with two 2-story residential buildings, the construction of a new one-story day-treatment building on currently vacant lands, and development of a new primary access from the Vista Del Sol, as well as ancillary site modifications including landscaping. The Project site occupies 26.22 acres in the urban area of the City, and is mostly developed. All but 5.50 acres of the site are developed. The following discussion evaluates the potential Project-related impacts to sensitive cultural resources including tribal cultural resources and other archaeological and historic resources.

Cultural Resources

a) Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5.

No Impact. As discussed in Section 2.7.5 above, no "historical resources" or archaeological resources are present within the Project area. Only one potential historical resource (site 33-029012) was found on the Project site; since it consists of remains from common mid-20th century residences in the desert region, the site would not be considered a "historical resource" pursuant to CEQA § 15064.5. All existing buildings, structures, and other features at the Betty Ford Center are modern in origin, dating only to the 1982-2002 era, and none of them demonstrates any outstanding merits in design, construction, engineering, or aesthetics. Therefore, the Project would have no impact on the significance of any historical resource in the Project area.

b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5.

Less than Significant with Mitigation. No archaeological resources were observed during the site-specific cultural resources field survey nor recorded during previous surveys. The Project site is located on the valley floor of the Coachella Valley in an area that does not harbor lithic or subsistence resources that would have been important to local bands of Native Americans. The area is also subject to erosive winds and sand deposition which will have removed any evidence of aboriginal trails across these lands. The Project site is not located within a culturally sensitive area. Should any archaeological resource be encountered during construction, implementation of Mitigation Measure CUL-1 will ensure appropriate procedures are followed and the impacts would be reduced to a less than significant level.

c) Disturb any human remains, including those interred outside of dedicated cemeteries.

Less than Significant with Mitigation. It is not anticipated that any human remains will be encountered during construction of the proposed Project. Most of the Project site and much of the surrounding area have been previously disturbed to accommodate development; past and current site conditions make the discovery of human remains very unlikely. Should any human remains be encountered during site excavation, California Health and Safety Code Section 7050.5 requires that all excavation stop, and that the County coroner inspect the site. Should the remains be identified as Native American by the coroner, the NAHC is required to contact the most likely descendant, and that descendant may recommend appropriate burial. This requirement, reflected in Mitigation Measure CUL-2, will assure that impacts associated with human remains are less than significant.

Tribal Cultural Resources

a) Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or

No Impact. The proposed Project will not impact a tribal historic resource that is listed or eligible for listing in the California Register of Historical Resources or in a local register of historical resources because none were identified or known to occur onsite. As explained in 2.7.6.a) above, the site-specific cultural resources survey determined that the Project site contains no historical resources pursuant to CEQA § 15064.5. The proposed Project area is not identified by the City of Rancho Mirage as an historic site or landmark. No impact will occur.

ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

Less than Significant with Mitigation. AB 52 requires that the consultation process between local and tribal governments begin prior to the release of an environmental impact report, negative declaration, or mitigated negative declaration. On December 12, 2019, the City of Rancho Mirage distributed AB 52 consultation letters for the proposed Project to the following 11 Native American tribes identified by the NAHC as having traditional lands or cultural places within City boundaries. Copies of the letters are provided in Appendix A .

- Twenty-Nine Palms Band of Mission Indians
- Torres-Martinez Desert Cahuilla Indians
- Cabazon Band of Mission Indians
- Augustine Band of Cahuilla Mission Indians
- Agua Caliente Band of Cahuilla Indians (ACBCI)
- Cahuilla Band of Indians
- Soboba Band of Luiseno Indians
- Ramona Band of Cahuilla Indians
- Morongo Band of Mission Indians
- Los Coyotes Band of Cahuilla and Cupeño Indians
- Santa Rosa Band of Cahuilla Indians

As of December 2019, written responses have been received from five tribes. Copies of the tribal responses are provided in Appendix A. Summaries of the responses are as follows:

- Morongo Band of Mission Indians: The Tribe does not have any information to provide at this time and they defer to the ACBCI during the AB 52 process.
- Cabazon Band of Mission Indians: The Tribe states that the subject property is located within its traditional use area but that the Tribe has no specific archival information for these lands.
- Augustine Band of Cahuilla Indians: The Tribe does not have any information to provide at this time but requests immediate notification of any discovery of Native American cultural resources during the Project-related activities.
- Twenty-Nine Palms Band of Mission Indians: The Tribe has no additional information on Native American cultural resources in the Project area but has requested to review the cultural reports of the Project.
- Agua Caliente Band of Cahuilla Indians: The Project site is not located within the boundaries of the ACBCI Reservation; however, it lies within the Tribe's Traditional Use Area. Therefore, the Tribe has requested the following:
    - A copy of the records search with associated survey reports and site records from the information center;
    - Copies of cultural resource reports prepared for the Project; and
    - On-site archaeological monitoring per Department of Interior standards during excavation activities.

No tribal cultural resources are known to exist on the Project site. Tribal representatives indicated that the site does not contain any tribal cultural resources, and as discussed in Section 2.6.6.b-c), the location and past and present conditions result in low potential for discovery of any cultural or archaeological resources, although the site is within the Traditional Use Area of the ACBCI and the Cabazon Band. With implementation of Mitigation Measures CUL-1 and CUL-2, potential impacts to archaeological resources of significance to Native American tribes would be less than significant.

2.6.7 Mitigation Measures

As noted above, the Project's potential impacts to cultural and historical including tribal resources is expected to be less than significant. To further ensure that impacts are kept below a level of significance, the Project shall comply with the following mitigation measures.

CUL-1. Monitoring
If any buried cultural materials are discovered during Project-related earth-moving operations, all work within 50 feet of the discovery should be halted or diverted until a qualified archaeologist can evaluate the nature and significance of the finds. The archaeologist shall prepare a findings report summarizing the methods and results of the investigation, including an itemized inventory and detailed analysis of recovered artifacts upon completion of field and laboratory work. The report shall include an interpretation of the cultural activities represented by the artifacts and discussion of their significance. The submittal of the report to the City and Tribal representative, as appropriate, along with final disposition of the recovered artifacts in a manner consistent with determination of the lead agency, Project archaeologist, and consulting tribes, will signify the completion of the monitoring program and, barring unexpected findings of significance, the mitigation of potential project impacts on cultural and tribal resources.

CUL-2. Prior to the initiation of new site disturbance, the applicant shall notify the Tribal staff of the Agua Caliente Band of Cahuilla Indians and the Twenty-Nine Palm Band of Mission Indians, and coordinate their appointment of a Native American Cultural Monitor for specific excavation activities.

CUL-3. Human Remains
Should buried human remains be discovered during grading or other construction activities, in accordance with State law, the County coroner shall be contacted. If the remains are determined to be of Native American heritage, the Native American Heritage Commission and the appropriate local Native American Tribe shall be contacted to determine the Most Likely Descendant (MLD).

2.6.8 Significance After Mitigation

The Project is not expected to result in any significant impact on cultural resources. Implementation of the above mitigation measures will further ensure impacts are less than significant upon the discovery of any cultural resources and their proper documentation.

2.6.9 Cumulative Impacts

The geographic scope of analysis of potential cumulative impacts on cultural and historical resources including tribal resources covers the Project site, its immediate vicinity, and the traditional use areas of the Cahuilla people in the Coachella Valley. The Project would contribute considerably to cumulative impacts if it were to have a substantial or significant adverse effect on those resources in the Coachella Valley.

The Historical/Archaeological Resources Survey conducted for the proposed Project evaluated a wide range of literature, data, and information on historical, archaeological, and tribal resources to establish a baseline of knowledge and understanding of these resources. Tribal representatives were contacted for their knowledge, input, and coordination regarding the presence of tribal resources in the Project area. No historical resources have been identified onsite as listed or eligible for listing under the California Register of Historical Resources or the National Register of Historic Places. No archaeological resources have been identified onsite. The potential for buried artifacts or resources to be unearthed during Project development is very low due to site location and past and present conditions. Potential impacts, if any, will be mitigated to less than significant levels through implementation of the mitigation measures set forth above. No new unmitigated impacts to historic or archaeological resources will result from the construction or operation of the proposed Project that are cumulatively considerable.

2.7 Geology and Soils

2.7.1 Introduction

This section of the EIR describes existing conditions with regard to geology and soils within the HBFC Project planning area and analyzes the potential impacts of the regional and/or local geology and soils to the proposed HBFC PDP Project. A wide range of data and information, ranging from research and subsurface borings conducted on the Project site to regional-scale planning and environmental documents, have been used in researching and analyzing the Project and its potential effects. They include a site-specific geotechnical analysis conducted in 2007[1], validated in 2013,[2] and updated in 2020.[3] These include detailed analysis of regional and local geology, soils, and seismic conditions, as well as detailed analysis of future conditions.

2.7.2 Thresholds of Significance

Based upon Appendix G of the CEQA Guidelines, the proposed HBFC project would be significantly affected by soils and/or geological conditions if they would:

a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

   i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area of based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42?
   ii) Strong seismic ground shaking?
   iii) Seismic-related ground failure, including liquefaction?
   iv) Landslides?

b) Result in substantial soil erosion or the loss of topsoil?

c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?

d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?

e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

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1 "Geotechnical Engineering and Seismic Hazard Report, Betty Ford Center Projects, 39-000 Bob Hope Drive, Rancho Mirage, California", prepared by Earth Systems Southwest on June 28, 2007. See Appendix D of this EIR.

2 "Geotechnical Engineering Report Update, Betty Ford Center Residential Day Treatment Center, 39-000 Bob Hope Drive, Rancho Mirage, California", prepared by Earth Systems Southwest on February 5, 2013. See Appendix D of this EIR.

3 "Geotechnical Engineering Report Update, Proposed Betty Ford Center Expansion, 39-000 Bob Hope Drive, Rancho Mirage, California", prepared by Earth Systems Southwest on January 27, 2020. See Appendix D of this EIR.

2.7.3 Regulatory Framework

Federal

No federal regulations are associated with geology and soils that are applicable to the proposed HBFC Project.

State

Seismic Hazards Mapping Act
The Seismic Hazards Mapping Act of 1990 (Public Resources Code Sections 2690 to 2699.6) was enacted, in part, to address seismic hazards not included in the Alquist-Priolo Act, including strong ground shaking, landslides, and liquefaction. Under this Act, the State Geologist is assigned the responsibility of identifying and mapping seismic hazards. California Geological Survey (CGS) Special Publication 117, adopted in 1997 by the State Mining and Geology Board, constitutes guidelines for evaluating seismic hazards other than surface faulting, and for recommending mitigation measures as required by Public Resources Code Section 2695 (a). In accordance with the mapping criteria, the CGS seismic hazard zone maps use a ground shaking event that corresponds to 10 percent probability of exceedance in 50 years.

Like the Alquist-Priolo Act, the Seismic Hazards Mapping Act of 1990 is intended to reduce damage resulting from earthquakes and California cities and counties are required to regulate development within mapped Seismic Hazard Zones. Under the Seismic Hazards Mapping Act, permit review is the primary mechanism for local regulation of development. Specifically, cities and counties are prohibited from issuing development permits for sites within Seismic Hazard Zones until appropriate site-specific geologic and/or geotechnical investigations have been conducted and measures to reduce potential damage have been incorporated into the development plans. According to the geotechnical report prepared for a previous project on the subject site, the proposed project site is not within a state-designated fault zone (also see Sections 2.7.4 & 2.7.5, below).

Alquist-Priolo Earthquake Fault Zoning Act
The Alquist-Priolo Geologic Hazards Zone Act was passed in 1972 by the State of California to mitigate the hazard of surface faulting to structures for human occupancy. The Act has been amended 10 times and was renamed the Alquist-Priolo Earthquake Fault Zoning Act on January 1, 1994. Its main purpose is to prevent the construction of structures used for human occupancy on the surface trace of active faults as documented in Special Publication 42 by CGS. The Act only addresses the hazard of surface fault rupture and is not directed toward other earthquake hazards.

California Building Codes
The California Building Code (CBC), which is codified in CCR Title 24, Part 2, was promulgated to safeguard the public health, safety, and general welfare by establishing minimum standards related to structural strength, egress facilities, and general building stability. The purpose of the CBC is to regulate and control the design, construction, quality of materials, use/occupancy, location, and maintenance of all building and structures within its jurisdiction. Title 24 is administered by the California Building Standards Commission, which by law is responsible for coordinating all building standards.

The 2019 CBC is based on the 2018 International Building Code (IBC) published by the International Code Conference. In addition, the CBC contains necessary California amendments that are based on the American Society of Civil Engineers (ASCE) Minimum Design Standards 7-05. ASCE 7-05 provides requirements for general structural design and includes means for determining earthquake loads, as well as other loads (e.g., flood, snow, wind) for inclusion in building codes. The provisions of the CBC apply to the construction, alteration, movement, replacement and demolition of every building or structure or any appurtenances connected or attached to such buildings or structures throughout California. The earthquake design requirements take into account the occupancy category of the structure, site class, soil classifications, and various seismic coefficients, all of which are used to

determine a Seismic Design Category (SDC) for a project. The SDC is a classification system that combines the occupancy categories with the level of expected ground motions at a given site, and ranges from SDC A (very small seismic vulnerability) to SDC E/F (very high seismic vulnerability and near a major fault). The Project site is classified as SDC D.[4] Design specifications are then determined according to the SDC.

California Code of Regulations, Title 14, Division 2, Chapter 8, Article 10
These regulations govern the exercise of city, county and state agency responsibilities to identify and map seismic hazard zones and to mitigate seismic hazards to protect public health and safety in accordance with the provisions of Public Resources Code, Section 2690 et seq. (Seismic Hazards Mapping Act). [5]

Regional and Local

County of Riverside General Plan[6]
Chapter 6, Safety Element, of the Riverside County General Plan addresses the issue of protection of its people from unreasonable risks associated with natural disasters, e.g., fires, floods, and earthquakes. The Safety Element of the General Plan contains policies that emphasize seismic safety issues because seismic events present the most widespread threat of devastation to life and property. While providing additional valuable information, the County General Plan has no direct regulatory effect on lands located in the City.

Rancho Mirage General Plan[7]
The City's General Plan also includes goals and policies relevant to issues of seismic safety and geotechnical conditions. These include reducing the hazards from wind-blown sand and dust, minimizing the potential for impacts from seismically induced hazards, and ensuring that city infrastructure is resistant to seismic shaking, surface fault rupture and seismically induced ground deformation.

2.7.4 Environmental Setting

Regional Geologic Setting
The proposed Project lies within the western portion of the Coachella Valley, which is the northwestern extension of the Salton Trough, a tectonic depression formed by regional faulting. The Salton Trough is roughly 130 miles long and 70 miles wide and extends from the San Gorgonio Pass to the Gulf of Mexico. Tectonically, the valley is a deep fault graben formed by tectonic movement along the San Andreas Fault (SAF)[8], a continental transform fault that traverses the east side of the valley. SAF forms the tectonic boundary between the Pacific and North American tectonic plates, which are sliding past one another at a rate of about 50 millimeters per year.[9] It is a complex strike-slip fault that represents a continuous zone of faulting from the San Francisco area to the Salton Sea. Approximately 70% of the movement between these plates is accommodated by SAF[10]. Given the valley's proximity to SAF and other active and potentially active faults, the composition of underlying soils, the presence of strong sustained winds, and steep and rugged mountains, this region is highly susceptible to seismic and other geologic forces. These issues are further addressed below and in the geotechnical report and updates prepared on the subject property (Appendix D).

4 Ibid.
5 Guidelines For Evaluating And Mitigating Seismic Hazards in California", Special Publication 117, 2008
6 Riverside County General Plan Update GPA No. 960 and Eastern Coachella Valley Area Plan, 2015.
7 "General Plan 2017 Update: City of Rancho Mirage", November 2017.
8 Alles, D. L. (2012). Geology of the Salton Trough.
9 "Technical Background Report to the Safety Element of the General Plan for Cathedral City," Earth Consultants International, Inc., June 1999.
10 Hill, M. L., & Dibblee, T. W. (1953). San Andreas, Garlock, and Big Pine faults, California a study of the character, history, and tectonic significance of their displacements. Geological Society of America Bulletin, 64(4), 443-458.

Regional Soils and Surficial Rocks

As noted, a site-specific geotechnical report was prepared in 2007 and its relevance and applicability to the subject Project were reaffirmed in 2013 and updated in 2020.[11] The Coachella Valley is bounded by the Little San Bernardino Mountains on the north and northeast, and the Santa Rosa and San Jacinto Mountains on the southwest and west, respectively. The San Jacinto and Santa Rosa Mountains form the Peninsular Ranges Province and are classified as Mesozoic granite first exposed about 95 million years ago.

Regional soils range from rocky outcrops within the mountains bordering the valley to coarse gravels of mountain canyons and recently laid fine- and medium-grained alluvial (stream-deposited) and aeolian (wind-deposited) sediments on the central valley floor. Sediments from the surrounding mountains are carried into and across the Coachella Valley through numerous seasonal streams. The Whitewater River and its extension, the Coachella Valley Stormwater Channel, are the master drainage for the valley, which generally flows northwest to southeast. Episodic flooding of major regional drainages results in the deposition of sand and gravel on the valley floor.

Faults

There are numerous earthquake-producing faults in the Coachella Valley, including the southern segment of the San Andreas Fault Zone (e.g. San Gorgonio Pass Thrust Fault and sub-parallel fault strands of Mission Creek, San Gorgonio, and Banning Faults)[12], San Jacinto Fault Zone (e.g. Buck Ridge Fault and Clark Fault)[13], Pinto Mountain Fault, faults in the Eastern California Shear Zone (including the Burnt Mountain, Eureka Peak, and Pisgah-Bullion Mountain-Mesquite Lake faults)[14], and the Elsinore Fault[15]. The network of the faults in the region is broadly classified as: San Andreas Fault Zone and San Jacinto Fault Zone, and is further discussed in Section 2.7.5 below.

2.7.5 Existing Conditions

Regional Geologic Setting

The Project site is located in the Coachella Valley which is a deep fault graben formed by tectonic movement along the San Andreas Fault (SAF).[16] SAF is a complex strike-slip fault that represents a continuous zone of faulting from the San Francisco area to the Salton Sea, and the motion accommodated by the fault zone is distributed along a complex system of interrelated faults.[17]

According to recent geophysical data, the southern segment (SSAF), one of the three major segments of the SAF, accommodates approximately 21-25 mm/yr of slip between the Pacific and North American plates.[18] At its southern terminus, the SSAF steps west over to the Imperial fault, creating the Salton pull-apart (extension) basin through a releasing bend in the right-lateral system. This movement has created a spreading zone in the valley and causes ongoing subsidence in the Salton Trough. The SSAF is located approximately 6.7 miles northeast of the Project site and has the potential of generating a maximum magnitude 7.7 earthquake[19]. Given the project site's proximity to

11 "Geotechnical Engineering and Seismic Hazard Report, Betty Ford Center Projects, 39-000 Bob Hope Drive, Rancho Mirage, California", prepared by Earth Systems Southwest on June 28, 2007. See Appendix D of this EIR.

12 Sieh, K., & Williams, P. L. (1990). Behavior of the southernmost San Andreas fault during the past 300 years.

13 Sharp, R. V. (1967). San Jacinto fault zone in the Peninsular Ranges of southern California. *Geological Society of America Bulletin*, *78*(6), 705-730.

14 Frankel, K. L., Glazner, A. F., Kirby, E., Monastero, F. C., Strane, M. D., Oskin, M. E., ... & Coleman, D. S. (2008). Active tectonics of the eastern California shear zone. *Field Guides*, *11*, 43-81.

15 California Division of Mines and Geology-Fault Evaluation Report FER-84 (April 16, 1979)

16 Alles, D. L. (2012). Geology of the Salton Trough.

17 Hill, M. L., & Dibblee, T. W. (1953). San Andreas, Garlock, and Big Pine faults, California a study of the character, history, and tectonic significance of their displacements. Geological Society of America Bulletin, 64(4), 443-458.

18 Sahakian, V., A. Kell, A. Harding, N. Driscoll, and G. Kent (2016), Geophysical evidence for a San Andreas subparallel transtensional fault along the northeastern shore of the Salton Sea, Bull. Seismol. Soc. Am., doi:10.1785/0120150350.

19 "Geotechnical Engineering and Seismic Hazard Report, Betty Ford Center Projects, 39-000 Bob Hope Drive, Rancho Mirage, California", prepared by Earth Systems Southwest on June 28, 2007.

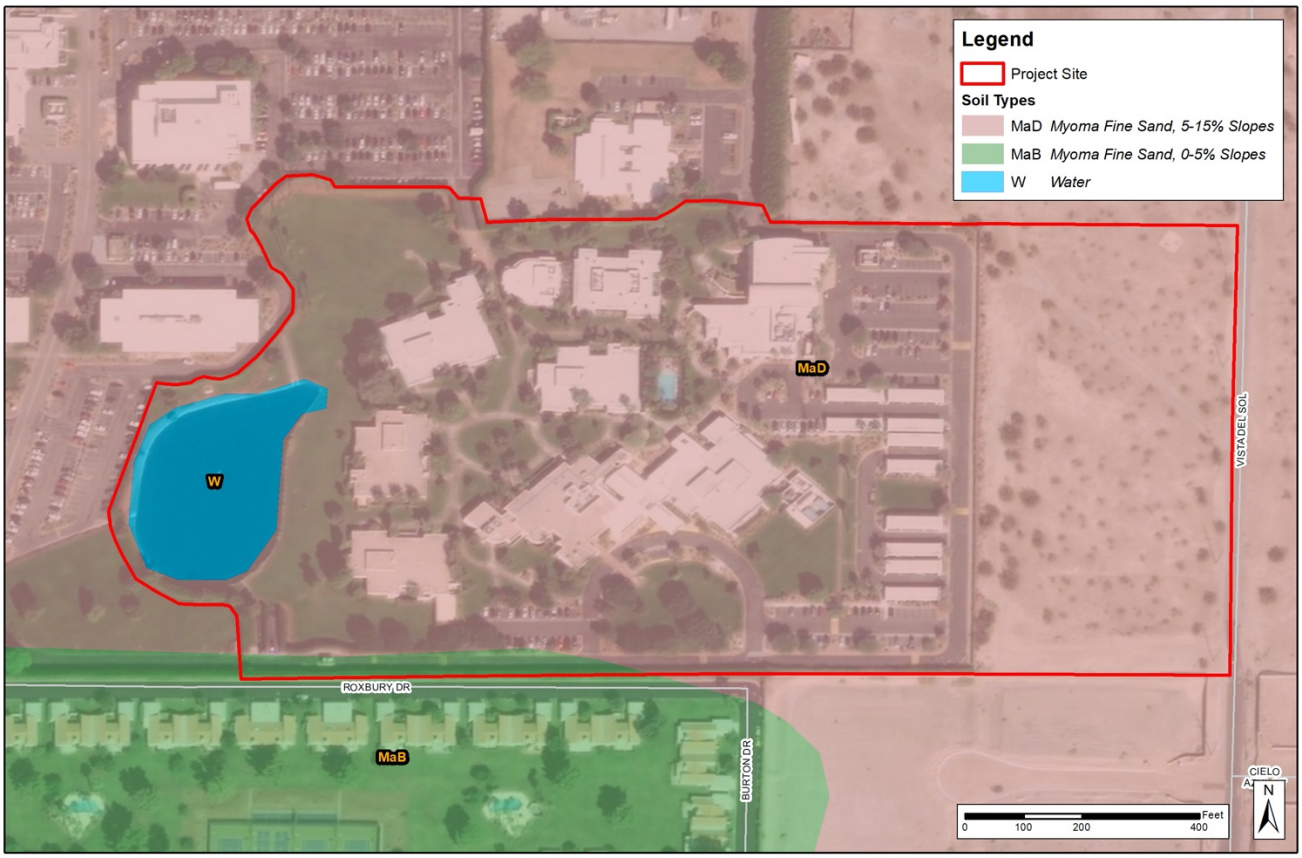
these and other active and potentially active faults, the composition of underlying soils, and geologic structure, the region is highly susceptible to seismic forces. These issues are further addressed below and in the geotechnical report prepared for the Project site (Appendix D).

Regional Soils and Surficial Rocks

The Coachella Valley is bounded by the Little San Bernardino Mountains on the north and northeast, and Santa Rosa and San Jacinto Mountains on the southwest and west, respectively. Geologic materials of the San Bernardino Mountains to the northwest are mainly comprised of ancient basement rocks that have been uplifted to their current elevations. The southwestern and southeastern margins of the San Bernardino Mountains are traversed by several strands of the San Andreas Fault zone that, in part, form the geomorphic and structural boundary of the range. The San Jacinto and Santa Rosa Mountains expose primarily Precambrian metamorphic and Mesozoic granite rocks. San Jacinto Mountain Range is traversed by San Jacinto Fault zone on its western margin.

Sediments from the bounding mountain ranges are carried into and across the Coachella Valley through numerous seasonal streams flowing to the Whitewater River, San Gorgonio River and the Snow, Chino Canyon, Tahquitz, Palm Canyon, Deep Canyon, Mission, Big Morongo, and Little Morongo Creeks. Episodic flooding of major regional drainages, including the Whitewater River and Coachella Valley Stormwater Channel, results in the deposition of sand and gravel on the valley floor.

Exhibit 2.7-1
Planning Area Soils Map



The Coachella Valley's geologic composition is also related to its proximity to the San Andreas Fault, which traverses the east side of the valley, and other active faults. The region is susceptible to a range of geologic hazards, including ground rupture, major ground shaking, slope instability, and collapsible and expansive soils. Strong sustained winds emanating from the San Gorgonio Pass, as well as northeast Santa Ana winds and monsoonal flows from the southeast, cause wind erosion and transport and deposit dry, finely granulated, sandy soils on the central valley floor.

Regional soils range from rocky outcrops within the mountains bordering the valley to coarse gravels of mountain canyons and recently laid fine- and medium-grained alluvial (stream-deposited), lacustrine (lakebed) and aeolian (wind-deposited) sediments on the central valley floor. Geologic units are typically described in terms of their age, and in the Coachella Valley, they range from recently deposited gravels and sands, to granitic and metamorphic rocks formed hundreds of millions of years ago.

Basement Rocks

The oldest rock formations in the Coachella Valley are basement rocks, which compose the mountain ranges bordering the Valley. The Santa Rosa Mountains in the southerly portion of the Valley are composed of hard crystalline granite and meta-sedimentary rock, which was emplaced more than 65 million years ago and forms the basement rock of the region. The Little San Bernardino Mountains in the northerly portion of the Valley consist of Precambrian metamorphic rocks.[20] These rocks are typically non-water bearing, except where extensively jointed and fractured.

Sedimentary Rocks

Sediments in the Salton Trough occur at depths of up to 3 miles deep and originate from the surrounding mountains and the Colorado River to the southeast. These sediments are approximately 3–5 million years old and are associated with the Imperial and Palm Spring Formations. These sediment deposits are composed of salt beds, silts and clays, and minor sand and channel gravels. In addition, fine-grained basin deposits are present on site and are generally comprised of sands, gravels, and conglomerates from the Ocotillo and Canebrake Formations.

The most recently laid sediments in the Coachella Valley are alluvial (stream-deposited) and aeolian (wind-deposited) sediments. Alluvial sediments typically consist of gravel, sand, and clay. They are deposited by mountain streams and found within alluvial fans and the lower reaches of mountains canyons. In the vicinity of the Salton Sea, they consist of fine clay that is probably lacustrine (lakebed) in origin. Aeolian deposits are silty sand and fine and medium-grained sand fractions that are transported by strong, sustained winds.

Sand Transport

Winds predominantly enter the Coachella Valley from the northwest and are funneled through the narrow San Gorgonio Pass. They generally blow in a southeasterly direction along the central axis of the valley and across the most erosive zones of the valley floor, resulting in the transport and re-deposition of sand along the length of the valley. The continual transport of sand has resulted in the formation and migration of extensive sand dunes, fields and sheets across the valley. One prominent feature of this process is the stabilized Palm Springs Sand Ridge, a thick accumulation of windblown sand that covers a significant portion of the valley floor south of Interstate 10 and rises as much as 100 to 120 feet above the valley floor.[21]

[20] Sylvester, A. G., & Smith, R. R. (1976). Tectonic transpression and basement-controlled deformation in San Andreas fault zone, Salton Trough, California. AAPG Bulletin, 60(12), 2081-2102.

[21] "Technical Background Report to the Safety Element of the Riverside County General Plan," Earth Consultants International, Inc., 2000.

Regional Faulting and Seismic Hazards

Faults

Many active faults or seismic zones are present within 62 miles of the subject site, including the San Andreas Fault Zone (comprising the Southern Fault, Mission Creek Branch, and Banning Branch), San Jacinto Fault Zone (e.g. Hot Springs-Buck Ridge Fault and Anza Fault), Pinto Mountain Fault, faults in the Eastern California Shear Zone (including the Burnt Mountain, Eureka Peak, and Pisgah-Bullion Mountain-Mesquite Lake faults)[22], and the Elsinore faults.[23] The nearest fault to the project site is the San Andreas – Banning Branch, which is located approximately 5.9 miles northwest of the project planning area, and capable of generating a maximum magnitude 7.2 earthquakes.[24] The network of the faults in the region is broadly classified as: San Andreas Fault Zone and San Jacinto Fault Zone, and is discussed below.

San Andreas Fault Zone

The San Andreas Fault Zone (SAFZ) is the principal boundary between the Pacific and North American plates and locally has been divided into several segments. This fault is considered the master fault in Southern California because it has frequent, large earthquakes and controls the seismic hazards of the area. In the vicinity of Riverside County, the San Andreas Fault Zone is comprised of three segments: 1) the San Bernardino Mountains segment, 2) the Coachella Valley segment, and 3) the Mojave Desert segment.[25] The Coachella Valley segment (aka Mission Creek Branch) is most relevant to the Project and the region[26], extending 71 miles from approximately the Salton Sea to the San Gorgonio Pass.[27] Co-seismic triggered surface displacements and creep caused by historical regional earthquakes have occurred on the Coachella segment following the April 23, 1992 Joshua Tree and June 28, 1992 Landers earthquakes, and the July 8, 1986 North Palm Spring earthquake.[28]

The most recent surface-rupturing earthquake on the Coachella segment of the SAF likely occurred in the late 1600's.[29] Prior to that, five paleo-earthquakes have been identified on the Coachella segment, occurring in about A.D. 825, 982, 1231, 1502, and 1680 based on a trenching study at Thousand Palms Oasis. These data indicate that the average recurrence interval for surface-rupturing earthquakes on the Coachella segment that exceed the design quake (20% probability in the next 50 years) is approximately 215 years (± 25 years), and that the last surface-rupturing event occurred approximately 339 years ago. While no large surface-rupturing earthquakes have occurred on this segment in historic times[30], the Coachella segment has the potential to generate a magnitude 7.2 earthquake and peak ground accelerations 0.32g in the project area.[31] There is a 22% chance that a magnitude 7 or greater earthquake may occur between 1994 and 2024 along the Coachella segment of the SAF.[32]

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22 Frankel, K. L., Glazner, A. F., Kirby, E., Monastero, F. C., Strane, M. D., Oskin, M. E., ... & Coleman, D. S. (2008). Active tectonics of the eastern California shear zone. *Field Guides*, *11*, 43-81.

23 "Geotechnical Engineering and Seismic Hazard Report, Betty Ford Center Projects, 39-000 Bob Hope Drive, Rancho Mirage, California", prepared by Earth Systems Southwest on June 28, 2007.

24 Ibid.

25 Natural Hazard Mapping, Analysis, and Mitigation: a Technical Background Report in Support of the Safety Element of the Riverside County 2004 General Plan, prepared by Earth Consultants International on August 2000.

26 Ibid.

27 Preliminary Geotechnical Investigation, Approximately 2200-Acre La Entrada Project (Preliminary Geotechnical Investigation) (Petra Geotechnical, Inc. [Petra], April 15, 2013)

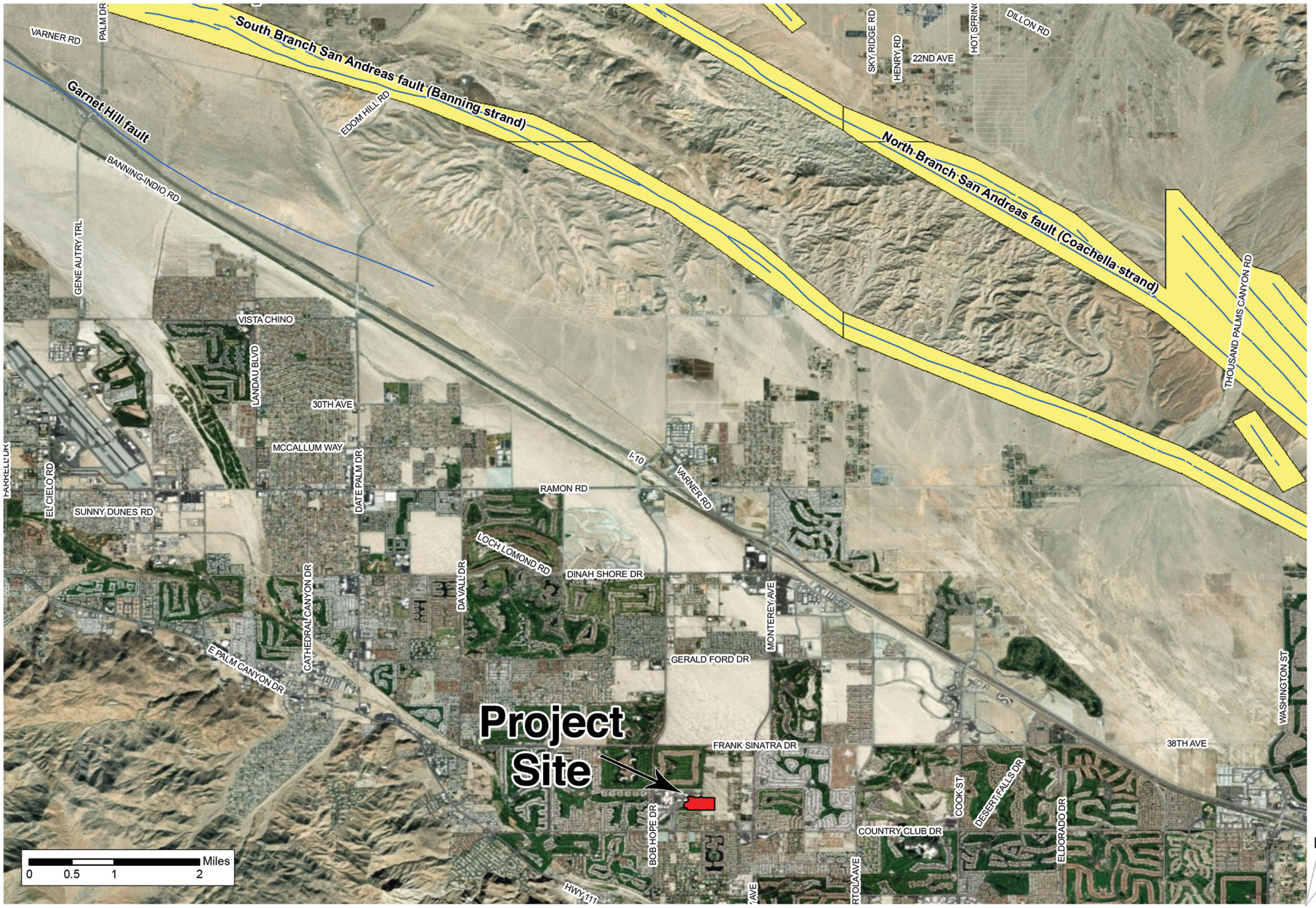
28 Ibid.

29 Fumal, T. E., Rymer, M.J., Seitz, G.G. (2002). "Timing of large earthquakes since A.D. 800 on the Mission Creek strand of the San Andreas fault zone at Thousand Palms Oasis, near Palm Springs, California." Bulletin of the Seismological Society of America v. 92(no. 7): p. 2841-2860.

30 Ibid.

31 "Geotechnical Engineering and Seismic Hazard Report, Betty Ford Center Projects, 39-000 Bob Hope Drive, Rancho Mirage, California", prepared by Earth Systems Southwest on June 28, 2007.

32 Ibid.



Source: Esri, USGS, 2019

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Hazelden Betty Ford Center PDP EIR
Planning Area Fault Map
Rancho Mirage, California

Hazelden Betty Ford Foundation

Exhibit
2.7-2

The San Andreas Fault Zone, which accommodates 21-25 mm/yr of slip between the Pacific and North American plates, crosses through and along the central axis of the Coachella Valley. The remaining tectonic movement is distributed among other faults and fault zones, many of which are in proximity to the Coachella Valley, including the San Jacinto, Whittier-Elsinore, Newport-Inglewood, and Palos Verdes faults to the west, and the Mojave Shear Zone to the north. Slip rates along the San Andreas Fault System vary from one location to the next, and from one period of time to another. The Coachella Valley segment of the San Andreas Fault is creeping at a rate of about 2 to 4 mm/year, with a long-term slip rate of about 25 mm/year ± 5 mm/year.[33]

San Jacinto Fault Zone

The San Jacinto Fault Zone consists of a series of closely spaced faults that form the western margin of the San Jacinto Mountains. The zone is about 175 miles long and extends from its junction with the San Andreas Fault in San Bernardino southeast toward the Brawley area, where it continues south of the international border as the Imperial Fault. The slip rate along San Jacinto fault zone has been 10-15 mm/yr since the Pleistocene.[34] This fault has generated more large earthquakes than any other fault in southern California, although none of these earthquakes has been as large as the 1857 and 1906 earthquakes on the San Andreas Fault.[35] The San Jacinto Fault is estimated to have a 31 percent probability of rupturing between 1994 and 2024. At least 16 past earthquakes on the Anza segment have been recognized in faulted rock layers.[36]

Seismic and Other Geologic Hazards

Due to its complex tectonic settings, the Coachella Valley and the Project area are highly susceptible to seismic activity and associated geologic hazards. Seismicity in this region is mainly associated with the San Andreas Fault Zone and San Jacinto Fault Zone.[37] The Project site is located close to the Banning Branch, Southern segment, and the Coachella Segment (aka Mission Creek Branch) of the San Andreas Fault. Exhibit 2.7-2 shows fault locations.

Local Soils

Site soils consist primarily of compacted dense sand with silt and silty sand. In the new Day Treatment building area, the site soils consist generally of uncompacted medium dense sand with silt, silty sand and some silt. The site soils were found to have a low sulfate ion concentration and thus have severe corrosivity to cement in concrete; the soils also have a low chloride ion concentration and can cause corrosion of reinforcing steel. Site soils may also have a moderate potential for metal loss from electrochemical corrosion processes.

Groundwater and Liquefaction

Liquefaction is associated with high groundwater and strong seismic ground shaking, which can liquefy soils and damage foundations, buildings and infrastructure. Nine exploratory borings were conducted to observe the soil profile and collect sub-surface soil samples in the project area. Groundwater was not encountered in the nine borings which reached about 50 feet below the ground surface. The depth to groundwater in the area is believed to be greater than 100 feet. Although groundwater levels may fluctuate with precipitation, irrigation, drainage, regional pumping from wells, and site grading, groundwater should not be a concern for project design and construction on the subject

33 Sieh, K. E., & Jahns, R. H. (1984). Holocene activity of the San Andreas fault at Wallace creek, California. Geological Society of America Bulletin, 95(8), 883-896.

34 Morton, D. M., & Matti, J. C. (1993). Extension and contraction within an evolving divergent strike-slip fault complex: The San Andreas and San Jacinto fault zones at their convergence in southern California. Geological Society of America Memoirs, 178, 217-230.

35 "Technical Background Report to the Safety Element" for the City of Coachella General Plan. Prepared by Earth Consultants International. 2014.

36 Thatcher, W., Hileman, J. A., & Hanks, T. C. (1975). Seismic slip distribution along the San Jacinto fault zone, southern California, and its implications. Geological Society of America Bulletin, 86(8), 1140-1146.

37 Nicholson, C. (1996). Seismic Behavior of the Southern San Andreas fault Zone in the Northern Coachella Valley, California: Comparison of the 1948 and 1986 Earthquake Sequences. Bulletin of the Seismological Society of America, 86(5), 1331-1349.

property. Liquefaction should not occur unless groundwater levels are within 50 feet of the ground surface and soils within the saturated zone are also susceptible to liquefaction. Therefore, liquefaction would be a negligible concern at the project site because groundwater level is most likely lower than 100 feet below the ground surface.

Slope Instability

The project site is relatively flat and not within an area identified as having a potential for slope instability. There are no known landslides at the site nor is the site in the path of any known landslides.

Collapsible Soils

Collapsible soils refer to the potential for granular soils to collapse upon wetting in arid climatic regions (hydroconsolidation), and is thus a potential geologic hazard in the Coachella Valley. Collapse typically occurs in areas with recently deposited soils. When saturated, soluble cements (carbonates) in the soil matrix dissolve, causing the soil to densify from its loose deposited structure. Collapse can be triggered by irrigation or change of water tables and accelerated by heavy weight on the ground surface (e.g. vehicle/equipment), causing rapid ground settlement.

Expansive Soils

Expansive soils are those that contain significant amounts of clay particles and, therefore, have the ability to give up water (shrink) or take on water (swell). When swelling occurs, the soils can exert significant pressure on structures built upon them. Two (2) cone penetrometer tests (CPT) were performed on the site and the CPT locations are shown in the Figure 2 of the Geotechnical Report prepared for the project site, Appendix D. Based on interpretations of the CPT data, the site soils may be generally described to consist of sand with silt, silty sand, and some silt, which are visually classified to be in the very low expansion category according to the California Building Code.

Subsidence

Ground subsidence is the gradual settling or sinking of the ground surface with little or no horizontal movement. During this process, water contained in subsurface clay layers is squeezed out, and the clay is compacted by the weight of overlying sediments. Subsidence can result in structural damage to structures that are sensitive to slight changes in elevation (e.g. larger buildings). Subsidence can also result in changes to surface drainage, reductions in aquifer storage capacity, and the formation of earth fissures.

In the Coachella Valley, subsidence is primarily associated with long-term groundwater extraction, although it may also be induced by strong seismic ground shaking. Regional subsidence is most likely to occur in the central and southeasterly portions of the valley, which are underlain by numerous clay layers that separate water-producing zones.[38] Land at or near the valley margins is also particularly susceptible to subsidence. The subject site is not located within an area of known subsidence associated with fluid (groundwater or petroleum) withdrawal, peat oxidation or hydroconsolidation. The amount of subsidence depends on relative density of the soil, ground motion, and earthquake duration. There is low potential for seismically induced ground subsidence on the project site, though uncompacted fill areas may be susceptible to seismically induced settlement.

Wind Erosion and Sand Transport

Wind erosion is initiated by wind forces exerted against the ground, and results in the transport and re-deposition of dry, sandy, finely granulated soils exposed to the wind regime. The movement of abrasive, sandy soils can also pose a serious public health hazard, reduce visibility, damage buildings and vehicles, and contribute to nutrient losses in plants. Blowing sand that collects on streets, parking lots and yards is removed at considerable expense.

[38] "Coachella Valley Water Management Plan," Coachella Valley Water District, January 2012.

The potential for natural erosion hazards is considered very severe in the project vicinity with a combination of the following conditions: loose to unconsolidated soils and sediments, little or no vegetation cover, and uncontrolled surface water runoff.[39] The project site lies within a recognized blow sand hazard area, and could be a source of fine particulate matter (PM_{10}) from blowing dust associated with site disturbance.

Paleontological Resources

Paleontological resources are the remains and/or traces of prehistoric life, exclusive of remains from human activities, and include the localities where fossils were collected and the sedimentary rock formations from which they were obtained. The most important character of the fossils is their geologic age which in the project vicinity could extend back up to 12,000 years (Late Pleistocene). In general, paleontological resources only occur in sedimentary rock such as sandstone, siltstone, mudstone, claystone, and shale. Specific rock and soil types of a locale are useful indicators in determining the likelihood for the presence of paleontological resources. Soils on the valley floor are generally post-Pleistocene age alluvium from the surrounding mountains.[40] Such soils are generally considered recent by paleontological standards and therefore have little potential to yield fossilized remains. Generally, fossil remains include marine shells and petrified wood and bones of fish, amphibians, reptiles, and mammals. In the Coachella Valley, paleontological resources (bivalves) are associated with the Lake Cahuilla sediments which generally consist of freshwater mollusks. The Project site contains Quaternary age alluvium deposits of silty sand with aeolian deposition further reducing the likelihood of encountering paleontological resources on these lands. Nonetheless, the subsurface has an unknown paleontological resource sensitivity.[41]

2.7.6 Project Impacts

The two basic categories by which geological and seismological impacts are assessed include those impacts that are the result of natural events and those that occur as a direct result of construction of the project. Examples of the former include fault displacement, earthquake-induced ground shaking, liquefaction, and landslides. These threats can often be reduced to a level of insignificance through avoidance or by proper engineering design. Examples of potential geological impacts that can occur as a result of project construction are typically related to disturbance of surficial geologic formations and include induced hydroconsolidation of collapsible soils, induced slope instability, and increased soil erosion.

Regardless of whether the impact is due to a natural event or a direct result of the proposed HBFC PDP Project, the following potential for impacts have been identified and are discussed below. The project impacts are analyzed based on the State CEQA Guidelines, as listed in Appendix G. The project would result in a significant impact to geology and soils if it would result in any of the following:

a) Will the Project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? (Refer to Division of Mines and Geology Special Publication 4.)

No Impact. The Project site is not located within an Alquist-Priolo Earthquake Fault Zone, and there are no known active or potentially active faults in the Project area or within the immediate vicinity. The nearest major active fault is the San Andreas Fault – Banning Branch, located approximately 5.9 miles northeast of the Project site and capable of generating a maximum probable quake of 7.2 Richter scale. Given its proximity to the subject site, moderate to

39 Rancho Mirage General Plan 2017; Earth Consultants International, Safety Element Technical Report, Riverside General Plan 2015.

40 "Paleontological Resources Assessment – College Park Specific Plan", prepared by CRM TECH. May 2009.

41 Rogers T.H (compiler), Jenkins, O.P (edition), 1965, Geologic Map of California, Santa Ana Sheet, sixth printing 1992, California Division of Mines and Geology, 1: 250,000.

severe ground shaking is considered the primary geologic hazard that could affect the Project site. Based on its location with respect to active faults and being outside any Alquist-Priolo Earthquake Fault Zone, impact related to fault-related ground rupture is not anticipated.

ii) Strong seismic ground shaking?

Less than Significant with Mitigation. As the Project site is located in proximity to the San Andreas Fault, there is a high probability that the Project site will be subject to strong ground shaking in the event of a major earthquake. To evaluate the building performance under the Design Basis Earthquake (DBE), the ground motion with a 10% probability of exceedance in 50 years (equal to about 475-year return period) was used to determine the Specific Seismic Coefficients.

The Project site is classified as Site Class D in the 2007 project geotechnical report based on a review of the location, and local soil and geologic conditions. The peak ground acceleration value for the project site was reported to be approximately 0.73g ("g" represents the rate of ground acceleration associated with gravity; 1.0g equals an acceleration of 32 feet per second) based on 2002 CGS/USGS Probabilistic Seismic Hazard Maps. The proposed Project will be subject to California Building Code. Based upon the adherence of project structural design to applicable seismic and other codes, the impacts of seismically induced ground shaking on the proposed buildings and structures can be reduced to a less than significant level.

The geotechnical report for the Project site provides specific design recommendations to address ground shaking and potential hazards. Implementation of these recommendations (presented as mitigation measures in Section 2.7.7 below) would minimize the potential for damage to the proposed buildings and structures in the event of a strong seismic event, and this impact would be less than significant with mitigation.

iii) Seismic-related ground failure, including liquefaction?

Less than Significant with Mitigation. Ground failure can take the form of liquefaction of underlying soils caused by strong ground shaking and high groundwater, landsliding (see below) and lateral spreading. Lateral spreading is the finite, lateral movement of gently to steeply sloping, saturated soil deposits caused by earthquake-induced liquefaction. No groundwater was found in the borings at about 50 feet below ground surface at the Project site, and groundwater depths are believed to be greater than 100 feet in the area. According to the 2020 geotechnical report update, a State Well located less than ½ mile south of the Project site had groundwater depth readings between 205 and 222 feet below ground surface between October 2011 and December 2019. Therefore, the potential for liquefaction and subsequent lateral spreading to occur on the Project site is negligible due to low ground water levels and the impact would be less than significant.

iv) Landslides?

No Impact. The City of Rancho Mirage General Plan indicates that potential landslide hazard is primarily located in hillsides and mountainous areas of the City. The Project is located on the valley floor and within the City's urban core, which is generally flat to gently sloping, and substantially developed. There are no known landslides or landslide hazard areas at the site or vicinity, nor is the site in the path of any known landslides. Therefore, no impact is anticipated.

b) Result in substantial soil erosion or the loss of topsoil?

Less than Significant with Mitigation. The site soils have a very severe susceptibility to wind and water erosion. Construction of the Project may result in the short-term loss of topsoil due to runoff and wind erosion. The Project site grading plans will be required to incorporate preventative measures to reduce soil erosion. A dust control management plan will be required as part of the grading permit to minimize potential impacts caused by blowing

dust and sand during and following construction. Procedures set forth in the plan will ensure that potential erosion is controlled during construction. Once completed, the Project area will consist of new structures, paved roads and parking areas, new landscaping and otherwise stabilized surfaces, which will resist erosion. Implementation of the mitigation measures provided in the geotechnical report will ensure the impacts related to soil erosion or loss of topsoil are less than significant (See Section 2.7.7 Mitigation Measures below).

c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

Less than Significant with Mitigation. This Project is not located within an area that is susceptible to landslides, lateral spreading, or liquefaction. Collapse is a potential geologic hazard in the Coachella Valley, and can be triggered by excessive irrigation or change of water tables and accelerated by heavy loads on the ground surface (e.g. vehicle/equipment) and cause rapid ground settlement. Ground subsidence associated with ground water extraction has been an issue in the project vicinity and especially in the eastern portion of the Coachella Valley. Several studies have been prepared by the USGS[42] on ground subsidence. Until just recently, ground water pumping has exceeded recharge, which has resulted in varying degrees of subsidence. In Palm Desert and the eastern portion of Rancho Mirage in the vicinity of the Whitewater River, the average subsidence rates increased from about 39 millimeters per year (mm/yr), or 0.13 foot per year (ft/yr), during 1995–2000 to about 45 mm/yr (0.15 ft/yr) during 2003–10. At the Project site, subsidence over this period has been very limited.[43]

The Project site is not located within an area of known subsidence associated with fluid (groundwater or petroleum) withdrawal, peat oxidation or hydroconsolidation. The potential for seismically induced ground subsidence is considered to be low at the Project site; however, uncompacted fill areas may be susceptible to seismically induced settlement. Building and seismic code requirements assure that the potential impact associated with ground subsidence or collapse is reduced to less than significant levels through conventional site preparation techniques such as over-excavation, moisture conditioning and recompaction.

The Project proposes new structures and other improvements that will be constructed in conformance with recommendations of the Project geologist and would not result in unmitigated unstable soils. The site soils are capable of supporting the proposed Project, provided the recommendations in the geotechnical report are followed in the Project design and construction. Mitigation measures in Section 2.7.7 below will ensure impacts regarding unstable soils and associated potential hazards are reduced to less than significant levels.

d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?

No Impact. The geotechnical report determined that, based on the cone penetrometer tests performed onsite, the site soils generally consist of sand with silt, silty sand, and some silt and are visually classified to be in the very low expansion category according to the California Building Code. Impacts related to expansive soils are not anticipated.

e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

No Impact. The proposed Project is located in developed area of the city that is served by sanitary sewer. Thus, sewer or wastewater disposal facilities will not be required. No impacts are anticipated.

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42 "Land Subsidence, Groundwater Levels, and Geology in the Coachella Valley, California, 1993–2010", prepared by the US Geological Survey, Dept. of the Interior.

43 Ibid.

f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Less than Significant with Mitigation. The Project site is not known to contain unique paleontological features; on-site soils are comprised of largely aeolian-deposited compacted dense sand with silt, uncompacted medium dense sand with silt, silty sand, and some silt. These soils have a very low probability of yielding sensitive paleontological resources. Neither does the subject property include any unique geologic features. Nonetheless, construction activities have the potential to reveal Quaternary-age alluvium which has an unknown paleontological resource sensitivity. To further reduce the potential impacts to paleontological resources due to excavation activities, GEO-13 is provided in the Mitigation Measures section below. A qualified paleontologist will be required to evaluate any buried paleontological materials discovered during earth-moving operations at the site to avoid or minimize potential Project impacts to less than significant levels. There are no unique geological features (rivers, lakes, hills, faults, folds, etc.) that could be directly or indirectly destroyed by the proposed Project. No impacts to such features would occur.

2.7.7 Mitigation Measures

The proposed Project will not have a significant adverse impact on the environment nor will it be significantly affected by geotechnical conditions that cannot be adequately addressed through project design and engineering, and standard construction management. Implementation of the various design and remedial grading recommendations set forth in the geotechnical report and updates prepared for the Project site will assure that the project would be subject to or cause less than significant impacts regarding geotechnical conditions. Therefore, while specific mitigation measures are not required, the following measures are recommended to ensure that appropriate structural and geotechnical engineering are incorporated in final project design.

Mitigation Measures

GEO-1. California Building Code
Final design and engineering shall conform to the prevailing California Building Code (CBC), in order to mitigate the effects of ground shaking and earthquake damage. The CBC lateral force requirements should be considered a minimum design standard, and the project proponent may develop performance-based criteria that suit the project needs.

GEO-2. Structural Foundation/Ground Improvements
Structural foundation designs and subsurface soil improvements shall be conducted as recommended in the geotechnical report and based on the California Code of Regulations Volume 18, Title 14, Article 10, Section 3721[a]) to minimize liquefaction hazards. Such measures shall include but are not limited to over-excavation and moisture conditioning and recompaction of soils. The Structural Engineer will need to take the structural loading and geotechnical parameters in the geotechnical report into consideration for footing design and reinforcing. A minimum footing depth of 12 inches below lowest adjacent grade shall be maintained.

GEO-3. Dust Control/Soil Erosion Plan
All grading plans shall include a soil erosion prevention/dust control plan. Site grading should be in strict compliance with the requirements of the South Coast Air Quality Management District (SCAQMD) and the Coachella Valley PM10 SIP. Blowing dust and sand during grading operations shall be mitigated by adequate watering of soils prior to and during grading, and limiting the area of dry, exposed and disturbed materials and soils during these activities.

GEO-4. Graded Slopes
Unprotected, permanent graded slopes shall not be steeper than 3:1 (horizontal/vertical) to reduce wind and rain erosion. Protected slopes with ground cover may be as steep as 2:1. Fill slopes shall be overfilled and trimmed back to competent material.

GEO-5. Grading Site Drainage
Positive site drainage shall be maintained away from the structures (5% for 5 feet minimum) to prevent ponding and subsequent saturation of the foundation soils. Gutters and downspouts should be considered as a means to convey water away from foundations if adequate drainage is not provided. Drainage shall be maintained and no water pond be allowed on or near paved areas.

GEO-6. Soil Erosion Protection
There shall be a cessation of grading activities during rainstorms or high wind events. As necessary, the project contractor shall install flow barriers and soil catchments (such as straw bales, silt fences, and temporary detention basins) during construction to control soil erosion.

GEO-7. Recompacting Soils
The native sandy soil may be used as engineered fill and utility trench backfill so long as it is free of organic or deleterious matter. The native soil should be placed in maximum 8-inch lifts (loose) and compacted to at least 90% relative compaction (ASTM D 1557) near its optimum moisture content. Compaction should be verified by testing.

GEO-8. Imported Soils
Imported fill soils (if needed) shall be non-expansive, granular soils meeting the USCS classifications prescribed in the geotechnical report. Import fill soils shall be evaluated by the geotechnical engineer before transported to the project site. Imported fill shall be placed in maximum 8-inch lifts (loose) and compacted to at least 90 percent relative compaction (ASTM D 1557) near optimum moisture content.

GEO-9. Excavations
Excavations shall be made in accordance with CALOSHA requirements. Excavations within sandy soil shall be kept moist, but not saturated, to reduce the potential of caving or sloughing. Where excavations over 4 feet deep are planned, lateral bracing or appropriate cut slopes of 1.5:1 (horizontal:vertical) shall be provided. No surcharge loads from stockpiled soils or construction materials shall be allowed within a horizontal distance measured from the top of the excavation slope and equal to the depth of the excavation.

GEO-10. Soil Corrosivity
The site soils contain low concentrations of sulfate and chloride irons that could cause corrosion of concrete and steel. No special provisions for concrete for these low concentrations are required by the CBC and normal concrete mixes shall suffice. However, a minimum concrete cover of three inches shall be provided around steel reinforcing or embedded components exposed to native soil or landscape water. The concrete shall be thoroughly vibrated during placement.

The site soils may cause moderate electrochemical corrosion of steel and other metals. Corrosion protection of steel can be achieved by using epoxy corrosion inhibitors, asphalt coatings, cathodic protection, or encapsulating with densely consolidated concrete.

GEO-11. Slabs-on-Grade
Concrete slabs-on-grade and flatwork shall be supported by compacted soil placed in accordance with measures GEO-7 & 8. Vapor retarder and other slab recommendations regarding slab thickness and reinforcement, control joints, and curing and quality control are provided in the geotechnical report, but are not to be construed as superseding any structural design. The project architect and/or design engineer shall ensure compliance with SB800 with regard to moisture and moisture vapor.

GEO-12. Retaining Walls
The geotechnical report provided lateral earth pressures for use in retaining wall design, and suggested that a backdrain or an equivalent system of backfill drainage shall be incorporated to ensure that all water is diverted away from the retaining wall. The foundation subgrade shall be prepared in accordance with measures GEO-7 & 8, and compaction on the retained side of the wall shall be performed by hand-operated or other lightweight equipment to reduce potential locked-in lateral pressures caused by heavy grading equipment.

GEO-13. Paleontological Monitoring
If buried paleontological materials are discovered during any earthmoving operations associated with the Project, all work within 50 feet of the discovery shall be halted or diverted until a qualified paleontologist can evaluate the nature and significance of the finds.

2.7.8 Significance After Mitigation

The geotechnical conditions in which the HBFC PDP Project will be constructed pose certain constraints, including seismic and soil conditions that require specific design and engineering solutions. With the application of the avoidance/minimization/mitigation measures set forth above and in the geotechnical report and updates, impacts associated with Project geotechnical conditions will be mitigated to a level of less than significant.

2.7.9 Cumulative Impacts

A consideration of cumulative effects associated with geotechnical conditions includes the degree to which a project may contribute to the cumulative impacts from seismic events, high groundwater, marginal soils, steep and unstable terrain and other conditions. The proposed Project will not significantly increase the cumulative impacts associated with prevailing geotechnical conditions in the Coachella Valley, nor will it have a cumulatively considerable effect on geotechnical hazards or risk in the Project area.

2.8 Greenhouse Gas Emissions

2.8.1 Introduction

This section of the EIR describes existing greenhouse gas (GHG) conditions within the Coachella Valley and analyzes the potential impacts in terms of GHG emissions associated with construction and operation of the HBFC PDP Project. A variety of local and regional data and information, ranging from analysis of the subject property to regional-scale planning and environmental documents, was used to analyze the proposed Project and its potential effects on GHG emissions and climate change. An Air Quality and Greenhouse Gas Report was prepared for this project and is provided in Appendix B of this EIR.

2.8.2 Thresholds of Significance

The following thresholds or criteria are derived from Appendix G of the Guidelines and are used to determine if and to what extent a project may have a potentially significant impact with regards to greenhouse gas emissions. The project would have a significant effect on greenhouse gases if the proposed Project were to:

a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.

b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

2.8.3 Regulatory Framework

The effects of GHG emissions and concentrations in the atmosphere have resulted in the adoption of governmental policies and regulations on federal, state and local levels that are intended to reduce GHG emissions by development projects, transportation and other activities.

State

California was the first state to establish regulations that require the reduction of GHG emissions from motor vehicles. On September 24, 2004, the California legislature adopted a bill that requires all motor vehicles of 2009 vintage or later to reduce their greenhouse gas emissions by about 30% by the year 2016. On June 1, 2005, Governor Arnold Schwarzenegger issued Executive Order S-3-05 which calls for reduction in GHG emissions to 1990 levels by 2020 and an 80 percent reduction below 1990 levels by 2050.

Assembly Bill 32 (AB 32)
Assembly Bill 32 (AB 32), the California Global Warming Solutions Act, was adopted by the State legislature in 2006. It sets forth a program to achieve 1990 emission levels by 2020 and requires CARB to proclaim 1990 GHG emissions and develop a Scoping Plan that sets forth GHG reduction methods. CARB reported that 1990 GHG emissions totaled 427 million metric tons (MMT) in California; CARB adopted a GHG scoping plan on December 11, 2008. The Scoping Plan includes a cap and trade program, green building strategies, recycling and waste reduction, and Voluntary Early Actions and Reductions.

Senate Bill 32 (SB 32)
More recently, Executive Order B-30-15 was issued by Governor Brown on April 29, 2015, establishing a new California goal to reduce greenhouse gas emissions to 40 percent below 1990 levels by 2030 and ensuring the State will continue its efforts to reduce carbon pollution. Most recently, this 40% target was codified through Senate Bill 32 (2016), which adds section 38566 to the Health and Safety Code and requires that CARB ensure statewide GHG emissions meet the 40% reduction target no later than December 31, 2030.

Senate Bill 375 (SB 375)

Senate Bill 375 (SB 375) was signed by the Governor in September 2008 and is intended to, at least in part, implement greenhouse gas reduction targets set forth in AB 32 by setting regional "caps" on the GHGs emitted by the transportation sector. The bill encourages regional land use planning to reduce vehicle miles traveled and requires Metropolitan Planning Organizations (MPOs) to adopt a sustainable communities strategy as part of their Regional Transportation Plans. The applicable MPO for the Coachella Valley is the Southern California Association of Governments (SCAG), which adopted its most recent Regional Transportation Plan and sustainable communities strategy in April 2016. The current reduction targets from SCAG's RTP and SCS are a 9% reduction by 2020 and a 16% reduction by 2035, as compared to 2005 emissions levels.

State Vehicle Standards

In response to the transportation sector accounting for more than half of California's carbon dioxide (CO_2) emissions, AB 1493 was enacted in 2002. AB 1493 required CARB to set GHG emission standards for passenger vehicles, light-duty trucks, and other vehicles determined by the state board to be vehicles whose primary use is noncommercial personal transportation in the state. The bill required that CARB set GHG emission standards for motor vehicles manufactured in 2009 and all subsequent model years. The 2009–2012 standards resulted in a reduction in approximately 22% GHG emissions compared to emissions from the 2002 fleet, and the 2013–2016 standards resulted in a reduction of approximately 30%.

In 2012, CARB approved a new emissions-control program for model years 2017 through 2025. The program combines the control of smog, soot, and global warming gases and requirements for greater numbers of zero-emission vehicles into a single package of standards called Advanced Clean Cars. By 2025, when the rules would be fully implemented, new automobiles would emit 34% fewer global warming gases and 75% fewer smog-forming emissions (CARB 2011).

Regional and Local

South Coast Air Quality Management District

The South Coast Air Quality Management District (SCAQMD) is responsible for monitoring air resources and enforcing air pollution regulations in the Salton Sea Air Basin (SSAB). It promotes numerous programs to combat climate change, including those that promote energy conservation, low-carbon fuel technologies, and renewable energy. It has adopted a number of regulations and policies aimed at ensuring clean air. In 2009, during SCAQMD GHG working group meetings, SCAQMD staff proposed a variety of thresholds for GHG emissions. However, as of January 2020, the SCAQMD Governing Board has not formally adopted the proposed interim tiered approach for evaluating GHG impacts.

Rancho Mirage Greenhouse Gas Inventory[1]

The Rancho Mirage Greenhouse Gas Inventory, completed in 2012, was the City's first major planning effort toward climate protection. It quantified the City's 2010 baseline year GHG emissions, including those emitted by municipal and community-wide sources. It also "back-casted" 1990 GHG emissions and projected future emissions under "business-as-usual" conditions.

Rancho Mirage Sustainability Plan[2]

The GHG Inventory described above served as a baseline guide for the Rancho Mirage Sustainability Plan. The Plan is consistent with the goals of AB 32 and calls for an eight year, three-phase period to address emissions reductions goals. For Rancho Mirage to achieve the statewide target of 1990 levels by 2020, it will have to reduce emissions by 54,272 tonnes, a 19.8% reduction. Phase I includes 24 policies and programs that will reduce carbon emissions by about 26,961 metric tons annually, approximately 45% of the total emissions requirement to reach the City's reduction goal by 2020. Phases II and III are long-term strategies that build upon Phase I initiatives.

1 "Rancho Mirage Greenhouse Gas Inventory," EcoMotion Incorporated, September 2012.
2 "Rancho Mirage Sustainability Plan," EcoMotion Incorporated, March 2013.

Rancho Mirage Green Building Code

The Rancho Mirage Green Building Code is contained in Chapter 15.02 of the City's Municipal Code. On November 21, 2019, the City adopted the 2019 California Green Building Standards Code effective January 1. 2020[3], which "enhances the design and construction of buildings through the use of building concepts having a reduced negative impact, or positive environmental impact and encouraging sustainable construction practice within the City."

Rancho Mirage General Plan

The following Rancho Mirage General Plan policies pertain to greenhouse gases and climate change and are relevant to the proposed Project:

Policy Safe 6.1: The City shall identify and periodically reassess local climate change vulnerabilities.

Policy Safe 6.2: The City shall develop adaptation measures that address the climate change impacts on Rancho Mirage's residents, businesses, and visitors.

Policy Safe 6.3: The City shall support initiatives, legislation, and actions to respond to climate change and consider potential cli-mate change impacts in planning and decision-making processes.

Policy Safe 6.4: The City shall work with local organizations to raise awareness about climate change impacts.

(Also see Section 2.4 Air Quality for additional measures related to clean energy and alternative transportation).

2.8.4 Environmental Setting

Greenhouse Gases

Air pollution is a chemical, physical, or biological process that modifies the chemistry and other characteristics of the atmosphere. The primary contributor to air pollution is the burning of fossil fuels used in transportation, power and heat generation, and industrial processes. The byproducts from the combustion of fossil fuels can contain air polluting substances. These emissions are responsible for the poor air quality that is evident in industrial centers worldwide.

Some air polluting agents are also greenhouse gases (GHG), including carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), and fluorinated gases (hydrofluorocarbons, perfluorocarbons and sulfur hexafluoride), which are released into the atmosphere through natural processes and human activities. GHGs are expressed in metric tons (MT) of CO2e (carbon dioxide equivalent). These gases are termed greenhouse gases due to their shared characteristic of trapping heat, and they are believed to be responsible for the global average increase in surface temperatures of 0.7-1.5 °F that were observed during the 20th century. The quantity of greenhouse gases in the atmosphere has increased significantly over a relatively short period.

Carbon dioxide is the primary greenhouse gas that has raised the most concern of atmospheric scientists due to current atmospheric levels, current and projected emission levels. Currently (2019-2020), carbon dioxide concentrations in the atmosphere exceed 400 ppm[4]. Comparatively, prior to the Industrial Revolution, about 250 years ago, CO_2 levels were 278 ppm, and over the past 650,000 years carbon dioxide levels have fluctuated between 180 and 300 ppm, making present day atmospheric CO_2 levels substantially greater than at any point in the past 650,000 years.[5]

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3 Ordinance No. 1160, City of Rancho Mirage, adopted 11/21/19.

4 Global Carbon Emissions for December 2019, NOAA, published 1//7/2020. Website accessed 1/30/2020. ftp://aftp.cmdl.noaa.gov/products/trends/co2/co2_mm_mlo.txt

5 "Working Group III Contribution to the Intergovernmental Panel on Climate Change Fourth Assessment Report, Climate Change 2007: Mitigation of Climate Change," prepared by the Intergovernmental Panel on Climate Change, May 2007.

While there is still some debate over what the effects of climate change will be, but there is broad consensus that emission levels need to be reduced significantly to minimize the effects these pollutants will have on future climate conditions.

California GHG Emissions

California is the second largest greenhouse gas contributor in the U.S. and the sixteenth largest in the world. In 2004, California produced 492 million metric tons (MMT) of CO_2 equivalent ($MMTCO_2e$), which was approximately 7% of all U.S. emissions. However, in 2015, California's total emissions were 440.4 $MMTCO_2e$, representing an overall decrease of 10% since peak levels in 2004. During the 2000 to 2015 period, per capita GHG emissions in California continued to drop from a peak in 2001 of 14.0 tons per person to 11.3 tons per person in 2015, a 19% decrease. This decrease may be due to increases in the effectiveness of energy conservation in buildings (Title 24 requirements) and the increased use of renewable energy, including solar generation, hydropower, and wind energy.

In 2017, emissions from GHG emitting activities statewide were 424 million metric tons of CO2 equivalent (MMTCO2e), 5 MMTCO2e lower than 2016 levels and 7 MMTCO2e below the 2020 GHG Limit of 431 MMTCO2e[6]. The transportation sector remains the largest source of GHG emissions in the State, accounting for 40% of California's emissions in 2017. Regulations and improved fuel efficiency of the State's vehicle fleet will drive down emissions over time, but population growth, lower fuel prices, improved economic conditions, and higher employment rates are potential factors that may increase fuel use.

2.8.5 Existing Conditions

The HBFC PDP Project is in the Coachella Valley portion of the Salton Sea Air Basin. The valley is characterized by a low desert climate, with summer daytime temperatures that can exceed 110°F; winter nighttime temperatures can drop into the 20's. The valley floor receives an average of four to six inches of rainfall per year with greater precipitation at higher elevations.

The existing HBFC is currently located on the westerly 20 acres of the proposed site, while the easterly +6 acres are currently vacant, sparsely vegetated, and covered with fine sandy soils. The site is immediately surrounded by the EMC to the west and north, and vacant EMC lands along the northeasterly potion of the HBFC campus boundary. Vista Del Sol forms the east boundary of the campus, with developed and vacant residential lands to the south. The broader vicinity is typical of a suburban community, generally developed with large lot residential, including life and convalescent care, mixed commercial, medical office, and resort residential land uses.

The Project area does not contain heavy industry or other point-source heavy pollution generators. Mobile pollution sources include vehicles on surrounding local and arterial roads, particularly Country Club Drive, Bob Hope Drive, and Frank Sinatra Drive. Higher traffic volumes occur on Interstate-10, approximately 3 miles to the north.

The City supports and implements a number of sustainability policies, programs, and initiatives in the areas of waste stream diversion, drought-tolerant landscaping, clean transportation (bike and golf carts paths, natural gas mass transit), energy efficiency and reduction, and green building strategies, and City-sponsored green energy options. Its GHG Inventory and Sustainability Plan establish community-wide GHG measures and reduction targets.

6 "2019 Edition, California Greenhouse Gas Emission Inventory: 2000-2017," California Environmental Protection Agency Air Resources Board, June 6, 2017.

2.8.6 Project Impacts

a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.

Less than Significant Impact. The proposed Project would generate GHG emissions during both construction and operational activities. Construction-related GHG emissions will be temporary and will end once construction is complete, while operational emissions will occur throughout the life of the Project. At buildout, five emission source categories will contribute either directly or indirectly to operational GHG emissions: energy/electricity usage, water usage, solid waste disposal, area emissions (pavement and architectural coating off-gassing), and mobile sources.

The California Emissions Estimator Model (CalEEMod), version 2016.3.2, was used to estimate Project-related GHG emissions during the construction phase, and annual operational emissions (see Appendix B of this EIR). The results are summarized in Table 2.8-1. For analysis purposes, existing operational emissions were compared to the proposed Project's emissions to determine the net impacts associated with the proposed renovation and expansion.

Construction GHG Emissions
Construction of the proposed Project is anticipated to occur over a four-year period with buildout in late 2024. For analysis purposes, all project components have been analyzed concurrently over a 2.5-year period. Phasing of the proposed Project will likely reduce GHG emission during construction, however, the single-phase buildout scenario analysis generates the worst-case scenario conditions.

Project construction data are listed below and have been applied to the CalEEMod model. During construction, fossil fuel use by construction equipment, machinery, haul trucks, and employees' commuter vehicles will generate short-term GHG emissions. All components of construction, including equipment, fuels, and materials, will be subject to current regulations of GHGs and equipment efficiency standards, which are meant to reduce GHG emissions.

- Building demolition: 51,694 square feet
- Grading material net export: 26,217 cubic yards
- Material hauling distance: currently unknown, assumed 20-mile radius.
- Project-specific construction equipment list (see Appendix B)
- Construction of new residential halls, day care facilities, and amenities: 56 new beds and approximately 23,000 square feet of new day treatment facilities (total of 156 beds)
- New asphalt and concrete, including on-site and improvements along Vista Del Sol: 87,129 square feet.

As shown in Table 2.8-1, construction of the HBFC PDP Project would result in a total of 2,635 MTCO2e over the 2.5-year buildout period. There are currently no construction related GHG emission thresholds for projects of this nature. To determine if construction emissions will result in a significant impact, build out GHG emissions were amortized over a 30-year period and added to annual operational emissions to be compared to applicable GHG thresholds.[7] Standard emission control requirements were applied to construction that include standard dust control management and requires all construction equipment meets or exceeds the California Air Resources Board (CARB) and U.S. Environmental Protection Agency (USEPA) Tier 4 off-road emissions standards for equipment rated at 50 horsepower or greater during Project construction (see Section 2.4 Air Quality for list of mitigation measures).

[7] "Interim CEQA GHG Significance Threshold for Stationary Sources, Rules and Plans," SCAQMD, December 5, 2008.

Operational GHG Emissions

Buildout of the Project is anticipated to occur in late 2024. As previously discussed, five emission source categories will contribute either directly or indirectly to operational GHG emissions: energy/electricity usage, water usage, solid waste disposal, area emissions (pavement and architectural coating off-gassing), and mobile sources. Existing operational emissions were compared to the proposed Project's emissions to determine the net impacts associated with the proposed renovation and expansion.

The following Project data was applied to the CalEEMod software to determine operational emissions. The results are shown in Table 2.8-1.

- New residential halls, day care facilities, and amenities: 56 new beds and approximately 23,000 square feet of new day treatment facilities (total of 156 beds)
- Office/administration/conference space: 49,677 square feet
- Traffic trip rate: Hospital daily trip rate based on 12/11/19 traffic counts; Office daily trip rate based on Traffic Report, ITE 10th Edition. Hospital = 8.87 trips per bed; Office = 9.74 trip per 1,000 square feet.

On December 5, 2008, the SCAQMD formally adopted a greenhouse gas significance threshold of 10,000 $MTCO_2e$/yr that only applies to stationary source projects (industrial uses) for which SCAQMD is the lead agency (SCAQMD Resolution No. 08-35). This threshold was adopted based upon an October 2008 staff report and draft interim guidance document[8] that also recommended a threshold for all projects using a tiered approach. It was recommended by SCAQMD staff that a project's greenhouse gas emissions would be considered significant if it could not comply with at least one of the following "tiered" tests:

Tier 1: Is there an applicable exemption?
Does Not Comply: The proposed Project does not qualify for an applicable exemption under CEQA.

Tier 2: Is the project compliant with a greenhouse gas reduction plan that is, at a minimum, consistent with the goals of AB 32?
Does Not Comply: Although the City of Rancho Mirage has an adopted Sustainability Plan which is consistent with AB 32, the Project would not comply with Tier 2 because the Plan is not a CEQA certified document. SCAQMD requires that the "greenhouse gas reduction plan," in this case the Sustainability Plan, have a certified Final CEQA document.

Tier 3: Is the project below an absolute threshold (10,000 MTCO2e/yr for industrial projects; 3,000 MTCO2e/yr for residential and commercial projects)?
Complies: The proposed Project is considered a residential/commercial project and is estimated to generate a net emission of 1,083 MT of CO_2e annually.

Tier 4: Is the project below a (yet to be set) performance threshold?
Does Not Comply: There are currently no performance thresholds applicable to the proposed Project to measure against.

Tier 5: Would the project achieve a screening level with off-site mitigation?
Does Not Comply: Off-site mitigation is not proposed.

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

Table 2.8-1
Greenhouse Gas Emissions Summary

	Existing Conditions MT CO_2e/Yr		Proposed Project MT CO_2e/Yr		Net Diff. MT CO_2e/Yr
	Total	**Per Bed**	**Total**	**Per Bed**	
Construction[1]	--	--	*2,811*	--	*+ 2,635*
Operation	*3,258*	*32.58*	*4,247*	*27.22*	*+ 989 / -5.36*
Amortized Construction Emissions[2]	--	--	*94*	--	*+ 88*
Operation at Buildout plus Amortized Construction Emissions	**3,258**	**32.58**	**4,341**	**27.83**	**+ 1,083**
Exceeds Tier 3 (3,000 MT/yr) Threshold?					**NO**

Source: CalEEMod Version 2016.3.2. See Appendix B for detailed tables. Values shown represent the total unmitigated GHG emission projections for operation of the proposed Project under two scenarios.
1. Construction GHG emissions are the total combined emissions from 2021-2023.
2. Buildout construction GHG emissions were amortized over 30 years then added to buildout operational GHG emissions. 2,811/30 = 94.

As expected, the emission data shows that overall operational emissions associated with the proposed HBFC would be higher than the existing HBFC due to the increased number of beds and facilities, and mobile trips. However, the proposed Project would reduce the HBFC's GHG emissions on a per bed basis from 32.58 $MTCO_2e$/yr to 27.83 $MTCO_2e$/yr due to replacing inefficient buildings with increased building efficiency. This overall GHG reduction also considers the increased fuel economy and GHG standards for passenger vehicles per AB 1493.

As shown in the table above, the HBFC PDP Project would result in the net increase of 1,083 $MTCO_2e$/yr and will not exceed SCAQMD GHG emission thresholds. Therefore, Project impacts related to direct or indirect GHG emissions are considered less than significant.

b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

Less than Significant Impact. All components of construction and operation, including equipment, fuels, materials, and management practices, would be subject to current SCAQMD rules and regulations related to greenhouse gases. Applicable SCAQMD rules include, but are not limited to, source-specific standards that reduce the greenhouse gas content in engines and limit equipment idling durations. The Project will also adhere to the required state Low Carbon Fuel Standard for construction equipment and heavy-duty vehicle efficiency standards.

The City of Rancho Mirage prepared its Sustainability Plan in 2013, which sets programs and policies to help the City reduce greenhouse gas emissions based on AB 32. According to the City's Sustainability Plan, 82 measures have been selected for implementation over the eight years between 2013 and 2020. According to the City's 2012 Greenhouse Gas Inventory, the City would have to reduce emissions by 54,272 $MTCO_2e$ to achieve 1990's levels by the end of 2020. The Greenhouse Gas Inventory has not been updated with new baselines or revised projections, and therefore it is not possible to know if the City has achieved it's AB 52 goals. However, the Project is considered consistent with the Sustainability Plan because it adheres to following reduction measures:

> Sustainable Parking Lots: Program to support existing shade standards through the promotion of parking lot coverings and semi-permeable surfaces for new construction to achieve 20% of existing parking lots, and 80% of new parking lots.
>
> New and Efficient Construction: Promote the Savings by Design Program from SCE for new commercial buildings.

CVWD Water Efficient Landscape Ordinance: Build on and exceed current CVWD landscape water conservation ordinance in the commercial sector by 20% community-wide by 2020.

Drought Tolerant Landscaping: Promote reduced need for turf irrigation.

Energy-Efficient, Commercial Sector Lighting: Promote and leverage existing incentives for efficient lighting and educate and locally incent building owners to eliminate any remaining T-12 lamps in commercial buildings.

In addition, since the Project will be replacing older infrastructure with new, all new buildings will be constructed in accordance with the California Building Code which requires the application of sustainable building technologies in new and major remodel construction. Sustainable building technology includes low energy lighting, high-efficiency HVAC systems, and water efficient appliances. In addition, proposed Project landscaping will be drought-tolerant, thus further promoting water efficiency.

In summary, the HBFC PDP Project complies with the applicable City GHG reduction strategies contained in the City's Sustainability Plan and SCAQMD regulations. Therefore, the Project would not generate significant levels of GHG emissions, and will not conflict with an applicable plan, policy or regulation adopted for the purpose of reducing GHG emissions. Impacts will be less than significant.

2.8.7 Mitigation Measures

The Project does not exceed GHG thresholds, therefore no mitigation measures are required.

2.8.8 Significance After Mitigation

The Project does not exceed GHG thresholds, therefore no mitigation measures are required.

2.8.9 Cumulative Impacts

The SCAQMD does not currently recommend quantified analyses of construction and/or operational GHG emissions from multiple development projects nor provides methodologies or thresholds of significance to be used to assess the significance of cumulative emissions generated by multiple projects. However, it is recommended that a project's potential contribution to cumulative impacts should be assessed utilizing the same significance criteria as those for project-specific impacts. Furthermore, SCAQMD states that if an individual development project generates less than significant construction or operational emissions, then the development project would not generate a cumulatively considerable increase in emissions for those pollutants for which the Basin is in nonattainment. Amortized construction and operational emissions of the proposed Project would not exceed established SCAQMD thresholds for GHG emissions, therefore, potential cumulative impacts considered less than significant.

2.9 Hazards and Hazardous Materials

2.9.1 Introduction

This section describes hazardous materials and other hazards to public health and safety that could result from the proposed Project. Potential construction and operational impacts related to hazards and hazardous materials are analyzed, and mitigation measures are proposed, as appropriate. This analysis also evaluates potential impacts from regional hazards including public and private airports and wildlife hazards. Geotechnical hazards are discussed separately in Section 2.7 of this EIR.

In this section, the term "hazardous materials" encompasses both hazardous substances and hazardous wastes. Federal and state law stipulate that materials and wastes may be considered hazardous if they are specifically listed by statute or if they are toxic, ignitable, corrosive, or reactive. There are circumstances where past activities, such as industrial or commercial operations on a site could have resulted in spills or leaks of hazardous materials to the ground, resulting in soil and/or groundwater contamination. Hazardous materials may also be required as part of, or result from, operation of a project or activity. If improperly handled, hazardous materials and waste can cause public health hazards when released to the soil, groundwater, or air.

The four basic exposure pathways through which an individual can be exposed to a chemical agent include: inhalation, ingestion, bodily contact, and injection. A common form of exposure is accidental release of hazardous materials during the construction phase. This type of exposure can lead to workers or the public to health hazards if they are released during the construction.

2.9.2 Thresholds of Significance

The following thresholds or criteria are derived from Appendix G of the Guidelines and are used to determine if and to what extent a project may have a potentially significant impact with regards to hazards and hazardous materials. The project would have a significant effect on or risk exposure to hazards or hazardous materials if the proposed Project were to:

a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.

b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.

c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.

d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment.

e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?

f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

2.9.3 Regulatory Framework

Federal

U.S. Department of Transportation Hazardous Materials Transport Act (49 USC 5101)
The U.S. Department of Transportation, in conjunction with the U.S. Environmental Protection Agency (USEPA), is responsible for enforcement and implementation of federal laws and regulations pertaining to transportation of hazardous materials. The Hazardous Materials Transportation Act of 1974 directs the U.S. Department of Transportation to establish criteria and regulations regarding the safe storage and transportation of hazardous materials. CFR 49, 171–180, regulates the transportation of hazardous materials, types of material defined as hazardous, and the marking of vehicles transporting hazardous materials.

Federal Resource Conservation and Recovery Act
The Resource Conservation and Recovery Act (RCRA) gives the USEPA the authority to control hazardous waste from "cradle-to-grave." This includes the generation, transportation, treatment, storage, and disposal of hazardous waste. RCRA also sets forth a framework for the management of non-hazardous solid wastes. The 1986 amendments to RCRA enabled EPA to address environmental problems that could result from underground tanks storing petroleum and other hazardous substances.

Federal Aviation Administration
The Federal Aviation Administration (FAA) has jurisdiction over airspace in the United States. The Federal Aviation Regulations (FAR) provide criteria for evaluating the potential effects of obstructions on the safe and efficient use of navigable airspace within approximately two to three miles of airport runways. The FAA requires notification of proposed construction projects that meet specific height requirements. As indicated, the Palm Springs International Airport, Bermuda Dunes Executive Airport and Jacqueline Cochran Regional Airport are in the vicinity of some the project. Also see Section 2.16: Transportation of this EIR for a discussion of the Project's potential effects on or from area airports.

State

California Occupational Safety and Health Act – California Labor Code, Section 6300
The California Occupational Safety and Health Act of 1973 addresses California employees' working conditions, enables the enforcement of workplace standards, and provides for advancements in the field of occupational health and safety. The Act also created the California Occupational Safety and Health Administration (Cal OSHA), the primary agency responsible for worker safety in the handling and use of chemicals in the workplace. Cal OSHA's standards are generally more stringent than federal regulations. Under the former, the employer is required to monitor worker exposure to listed hazardous substances and notify workers of exposure.

The regulations specify requirements for employee training, availability of safety equipment, accident-prevention programs, and hazardous substances and hazardous substance exposure warnings. At sites known or suspected to be contaminated by hazardous materials, workers must have training in hazardous materials operations and a Site Health and Safety Plan must be prepared. The Health and Safety Plan establishes policies and procedures to protect workers and the public from exposure to potential hazardous at the contaminated site.

California Health and Safety Code, Title 22, Chapter 20 Hazardous Waste Permit Program
Title 22, Chapter 20 Hazardous Waste Permit Program, establishes provisions for the issuance and administration of hazardous waste permits pursuant to the Health and Safety Code. Regulations cover basic permitting requirements, such as application requirements, standard permit conditions, and monitoring and reporting requirements. Hazardous Waste Permits are required for the transfer, treatment, storage, and disposal of any hazardous waste pursuant to section 66261.3. Owners and operators of certain facilities require hazardous waste facility permits as well as permits under other programs for certain aspects of the facility operation.

California Health and Safety Code, Division 20, Chapter 6.5, Hazardous Waste Control Law

The California Health and Safety Code, Division 20, Chapter 6.5, Hazardous Waste Control Law regulates hazardous wastes generated within the State of California. The Law identifies proper guidance for the handling, storage, use, and disposal of hazardous wastes. Additionally, the law identifies the need for proper landfill disposal in order in order to reduce long-term threats to public health and to air and water quality.

Included in this is the preparation of Hazardous Materials Business Plans (HMBPs) (Chapter 6.95 of the Health and Safety Code, Sections 25501 et seq.), which are required of businesses that handle specified quantities of chemicals in accordance with community right-to-know laws. This plan allows local agencies to plan appropriately for a chemical release, fire, or other incidents. Hazardous waste regulations establish criteria for identifying, packaging, and labeling hazardous wastes; dictate the management of hazardous waste; establish permit requirements for hazardous waste treatment, storage, disposal and transportation; and identify hazardous wastes that cannot be disposed of in landfills.

License to Transport Hazardous Materials – California Vehicle Code, Section 32000.5 et seq.

Caltrans regulates hazardous materials transportation on all interstate roads. Within California, the State agencies with primary responsibility for enforcing federal and State regulations and for responding to transportation emergencies are the California Highway Patrol (CHP) and Caltrans. Together, federal and State agencies determine driver-training requirements, load labeling procedures, and container specifications for vehicles transporting hazardous materials.

California Fire Code, Title 24, Part 9, Chapters 33, 50, and 57

The 2013 California Fire Code (CFC), written by the California Building Standards Commission, is based on the 2012 International Fire Code. The International Fire Code (IFC) is a model code that regulates minimum fire safety requirements for new and existing buildings, facilities, storage and processes. The IFC addresses fire prevention, fire protection, life safety, and safe storage and use of hazardous materials in new and existing buildings, facilities, and processes.

Uniform Fire Code

The Uniform Fire Code, Article 80 (Section 80.103 of the Uniform Fire Code as adopted by the State Fire Marshal pursuant to Health and Safety Code Section 13143.9), includes specific requirements for safe storage and handling of hazardous materials and for mixing of incompatible chemicals, and specifies specific design features to reduce the potential for a release of hazardous materials that could affect public health or the environment.

Emergency Response Planning

California has developed an emergency response plan to coordinate emergency services provided by federal, state, and local government and private entities. Responding to hazardous materials incidents is one part of this plan. The plan is administered by the State Office of Emergency Health Department's Emergency Services, which coordinates the responses of other agencies. The Riverside County Environmental Health Department's Emergency Response Team provides the capabilities for hazardous materials emergencies within the project area. Emergency Response Team members respond and work with local fire and police agencies, California Highway Patrol, California Department of Fish and Wildfire, California Department of Transportation, U.S. Coast Guard and National Marine Sanctuary personnel.

CAL FIRE

CAL FIRE maps identify fire hazard severity zones in the state and local responsibility areas. Wildland fire protection in California is the responsibility of either the state, local government, or the federal government. A Designated Safety Responsibility Area (SRA) is the area "in which the financial responsibility of preventing and suppressing fires is primarily the responsibility of the state" (Public Resources Code Section 4125). Local responsibility areas (LRA) in the project study area include incorporated cities, cultivated agricultural lands, and portions of the desert. LRA fire protection is typically provided by city fire departments, fire protection districts, counties, and by CAL FIRE under contract to local government.

Regional/Local

Riverside County Department of Environmental Health

The Riverside County Department of Environmental Health Hazardous Materials Branch is responsible for overseeing the six hazardous materials programs in the County. The Branch is responsible for inspecting facilities that handle hazardous materials, generate hazardous waste, treat hazardous waste, own/operate underground storage tanks, own/operate aboveground petroleum storage tanks, or handle other materials subject to the California Accidental Release Program. In addition, the Branch maintains an emergency response team that responds to hazardous materials and other environmental health emergencies 24 hours a day, 7 days a week. The County-wide Hazardous Materials Emergency Response Team consists of personnel from the Riverside County Fire Department and Environmental Health HazMat Program staff. This team responds jointly to hazardous materials incidents in the County and any CalFire-contracted city, including Rancho Mirage.

Riverside County Hazardous Waste Management Plans (HWMP)

Pursuant to AB 2948 (Tanner, 1986), Riverside County prepared the Hazardous Waste Management Plans (HWMP) that was adopted in 1990. The HWMP identifies the type and quantity of hazardous waste generated in the County. It projects future quantities likely to be generated, and includes goals, policies, and standards for the management of hazardous waste. Also, the HWMP establishes procedures for the siting of new hazardous materials treatment, storage, and disposal facilities.

HWMP policies require the County to coordinate its efforts with state and federal agencies in the identification and establishment of programs for managing these wastes. As an integral part of the County HWMP, the City hazardous waste management policies of the General Plan are basically extensions of the County Plan and are hereby incorporated by reference.

Rancho Mirage General Plan 2017

The City's 2017 General Plan takes steps to address hazardous materials and local hazards by including programs and policies to reduce potential exposure to potentially hazardous materials. The applicable policies would help the project to avoid or reduce potential impacts, and include:

Policy Safe 4.1: The City shall minimize the exposure of residents, business owners, and visitors to the impacts of structural and wildland fires.

Policy Safe 4.2: The City shall conduct long-range fire safety planning, including enforcement of stringent building, fire, subdivision and other Municipal Code standards, improved infrastructure, and mutual aid agreements with other public agencies and the private sector.

Policy Safe 4.3: The City shall support area-wide mutual aid agreements and communication links with Riverside County authorities and other participating jurisdictions.

Policy Safe 4.4: The City shall ensure adequate provision of public information to residents and businesses on actions to minimize damage and facilitate recovery from a natural disaster.

Policy Safe 5.1: The City shall regulate, to the extent empowered, the delivery, use, and storage of hazardous materials in city limits and the SOI.

Policy Safe 5.2: The City shall require and facilitate the safe and responsible disposal and cleanup of all hazardous/toxic waste and waste sites in Rancho Mirage and the SOI.

Policy Safe 5.3: The City shall coordinate with the Fire and Sheriff's Department to develop a system for roadway management and for alerting emergency and medical facilities to the impending transport of hazardous and toxic materials.

Policy Safe 5.4: The City shall coordinate with the Regional Water Quality Control Board and the CVWD to monitor and regulate the use and phased removal of subsurface sewage disposal systems.

2.9.4 Environmental Setting

A hazardous material is any substance that, because of its quantity, concentration, or physical or chemical properties, may pose a hazard to human health and the environment. Under Title 22 of the California Code of Regulations (CCR), the term "hazardous substance" refers to both hazardous materials and hazardous wastes.[1] Both of these are classified according to four properties: (1) ignitability; (2) corrosivity; (3) reactivity; and (4) toxicity. A hazardous material is defined as a substance or combination of substances which, because of its quantity, concentration, or physical, chemical or infectious characteristics, may either (1) cause, or significantly contribute to an increase in mortality or an increase in serious irreversible, or incapacitating reversible illness; or (2) pose a substantial present or potential hazard to human health or the environment when improperly treated, stored, transported, disposed of or otherwise managed.[2]

Hazardous materials and chemicals are used daily in industry, institutions, businesses, and residences. Some hazardous material sources include seemingly innocuous businesses such as service stations, medical labs, dry-cleaners, and photo processing centers. Others are large enterprises that may generate large quantities of hazardous waste, such as chemical manufacturers, electroplating companies, or petroleum distilleries. In addition, commonly used household products such as paints, cleaners, oils, batteries, and pesticides contain potentially hazardous ingredients. Accidental spills or leaks, illegal dumping of hazardous waste, illegal storage, or a transportation accident could release hazardous materials in the community.

Both the federal government and the State of California require all businesses that store hazardous materials in excess of specified quantities to report their chemical inventories in a Hazardous Materials Management Plan. Businesses are also required to report releases of toxic chemicals into the air, water, and land, as well as off-site transfers of waste to another location. Facilities that store hazardous materials are required to report on pollution prevention activities and chemical recycling. All of these businesses operate under stringent regulations governing the storage, use, manufacturing, and handling of hazardous materials.

The U.S. Environmental Protection Agency (EPA) maintains and publishes a database that lists properties that handle or produce hazardous materials. The EPA defines a small quantity waste generator as one that produces between 100 and 1,000 kilograms of hazardous waste per month.[3] Small businesses like dry cleaners, auto repair shops, hospitals, and metal plating shops usually are defined as generators of small quantities of hazardous waste.[4] The proposed Project is considered a small quantity generator.

State and federal agencies regulate hazardous materials. The Hazardous Waste Control law (Chapter 6.5 of Division 20 of the Health and Safety Code) and Title 26 of the CCR list more than 800 potentially hazardous materials and establish criteria for identifying, packaging, and disposing of such wastes. Under these regulations, the generator of any hazardous waste material must complete a manifest that accompanies the material from the point of generation to transportation to the ultimate disposal location, with copies of the manifest filed with State Department of Toxic Substance Control.

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1 California Department of Toxic Substances Control Website, https://www.dtsc.ca.gov/Title22/, accessed January 2020.

2 United States Environmental Protection Agency Website - Resource Conservation and Recovery Act (RCRA) and Federal Facilities, https://www.epa.gov/enforcement/resource-conservation-and-recovery-act-rcra-and-federal-facilities, accessed January 2020.

3 United States Environmental Protection Agency Website - Categories of Hazardous Waste Generators, https://www.epa.gov/hwgenerators/categories-hazardous-waste-generators, accessed January 2020.

4 A Guide for Small Businesses – Managing your Hazardous Waste by United States Environmental Protection Agency (2001).

2.9.5 Existing Conditions

Areas with Potential Hazardous Materials Contamination

SWRCB maintains an online database (GeoTracker) which includes information on existing locations of hazardous waste sites and their status. There are no hazardous material sites recorded on the proposed property and there are no active clean-up sites in the Project vicinity.[5]

Airports

The nearest airports to the Project site are Palm Springs International Airport (PSP) and Bermuda Dunes Airport (UDD). PSP is the largest and primary air transportation link for the region and is located approximately 6.8 miles northwest of the Project site. It is classified in the National Plan of Integrated Airport Systems (NPIAS) as a long-haul commercial service airport. It also handles air freight and provides heliport access that is largely limited to medical evacuation flights between the Desert Regional Medical Center and Eisenhower Medical Center. UDD is a privately owned, public use airport located approximately 7 miles southeast of the Project site. It accommodates corporate and private aircraft and is the designated airport for medivac flights for John F. Kennedy Hospital and Eisenhower Medical Center.

Schools

The Project site is within Desert Sands Unified School District (DSUSD) service boundary. The nearest school to the Project site is Rancho Mirage Elementary School, located approximately 1.97 miles southwest of the Project site. No school sites are located within a quarter mile of any component of the proposed Project.

Wildfire

The City of Rancho Mirage is exposed to fire-related hazards from two potential sources: wildfires and fires that occur in urban settings. Wildfire hazards are highest in areas of the community near the wildland-urban interface (WUI). Southern portions of the City are susceptible to the risk of wildland fires. The Project is located in the urban core of the City, and approximately two miles from an area of wildland fire potential.

Primary Emergency Evacuation Routes

The two main evacuation routes in the City include I-10 and Highway 111, along with primary and minor arterial streets serving as secondary routes, including Country Club Drive, Bob Hope Drive, Frank Sinatra Drive and Monterey Avenue. The Project site is located between Country Club, Frank Sinatra, and Bob Hope Drive, which provide access in an emergency for the majority of the central city.

Phase I Initial Site Assessment

A Phase I Initial Site Environmental Assessment (Phase I) was conducted for the Project site to identify any potentially hazardous substances onsite or in the Project vicinity that could impact or be impacted by the proposed Project. The Phase I determined there were no known onsite conditions that posed risk of hazardous materials exposures, or that would warrant regulatory involvement, including actions leading to environmental soil sampling, soil remediation, groundwater sampling, and/or groundwater remediation.[6] Neither did the Phase I study identify any significant up-gradient releases of hazardous materials that could impact the subject property.

2.9.6 Project Impacts

The following discussion analyses the potential hazards and hazardous materials impacts that could occur to or be caused by the proposed Project. The proposed HBFC Project could have or be subject to significant impacts if it would:

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5 GeoTracker Online Database List, https://geotracker.waterboards.ca.gov/map/?CMD=runreport&myaddress=rancho+mirage+, accessed February 2020.

6 Phase I Environment Site Assessment for the Hazelden Betty Ford Center, prepared by Terra Nova Planning and Research, January 2020.

a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.

b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.

Less than Significant Impact With Mitigation. Hazardous materials are transported through the Rancho Mirage area along Highway 111 and other local roads, as well as along the Union Pacific Railroad line and the I-10. Designated truck routes in the City include Ramon Road, Dinah Shore Drive, Gerald Ford Drive (time restricted), Bob Hope Drive (partially time-restricted), Frank Sinatra Drive east of Bob Hope Drive), Country Club Drive (east of Bob Hope Drive), Monterey Avenue and Highway 111.

The proposed Project involves the demolition of four existing two-story buildings totaling 51,694 square feet and built post 1982. While the use of asbestos and lead in new construction ended prior to the construction of these buildings, there remains a limited possibility that either of these hazardous materials may still be found within these buildings. Therefore, a mitigation measure (HAZ-1) is recommended that would provide for a reconnaissance-level survey of these buildings prior to their demolition to ensure that proper methods and protocol are used during demolition and hauling. In this regard, this measure will ensure that these potential impacts can be kept to insignificant levels.

The proposed Project would also involve use of limited quantities of hazardous materials such as cleaning and degreasing solvents, fertilizers, pesticides, and similar materials. These chemicals will be transported and stored within the Project site. These will occur in limited quantities and will not require a hazardous material handling/storage permit. The manner in which commercial chemicals are stored and handled is highly regulated by the Fire Department, County and State. These standard requirements will assure that impacts associated with commercial quantities of chemicals will be less than significant.

c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.

No Impact. The Project site is not located within ¼ mile of an existing or proposed school. The nearest school to the project site is the Rancho Mirage Elementary School located approximately 2 miles southwest of the project site. The proposed project will not generate hazardous materials, nor will these products be used in the project area. There will be no impact to schools.

d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment.

No Impact. There are no hazardous materials or waste sites located on or near the site, as determined in the Phase I. In addition, the proposed site is not included on a list compiled pursuant to Government Code Section 65962.5. The proposed Project will not create a significant hazard to the public or environment. No impact is anticipated.

e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?

No Impact. The project is not located within an airport land use plan or private airstrip. Flights approaching and departing the Palm Springs International Airport may fly over the City, but these flights would be more than three miles from the runways and at a high altitude.

f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Less than Significant. City of Rancho Mirage has a Multi-Hazard Functional Plan, originally adopted in 1994, which is continually updated. The two main evacuation routes in the City include I-10 and Highway 111, along with primary and minor arterial streets serving as secondary routes. The proposed Project is located within the Eisenhower Medical Center campus, which currently has direct access to two minor arterial roadways, Bob Hope Drive and Country Club Drive. The HBFC campus is located at the east end of the EMC campus and currently has no direct access to Vista Del Sol or any other public street. The site must be accessed via the EMC internal road network. In order to address this limited accessibility, the Project proposes an additional access point along Vista Del Sol, which will provide access to Country Club Drive and Frank Sinatra Drive. In this regard, the proposed Project's Vista Del Sol access will ensure adequate emergency access for the HBFC campus.

The proposed Project will not require temporary lane closures, detours or re-routing either during or following construction. At build out, improved roadway capacity and additional campus access will enhance access for emergency vehicles. Therefore, there will be a less than significant impact to the adopted emergency response plan or evacuation plan.

g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

No Impact. The subject property is not located in a wildland fire hazard area (General Plan, Chapter 8 Safety, Exhibit 27 Fire Threat Map) and the proposed Project will not expose people or structures to a significant risk of loss, injury, or death involving wildland fires. Therefore, no impact would occur.

2.9.7 Mitigation Measures

As noted, demolition of the existing residential halls has the potential to release hazardous airborne substances, such as asbestos. The following mitigation measures are recommended to assure that project-related hazards are avoided or reduced to insignificant levels.

HAZ-1 Prior to demolition of the HBFC residential halls, an asbestos inspection shall be conducted by a qualified professional in accordance with currently accepted methods and protocols. A comprehensive report of methods, findings, and recommendations shall be provided to the City.

2.9.8 Significance After Mitigation

With implementation of the mitigation measure HAZ-1, Project-related impacts will be less than significant.

2.9.9 Cumulative Impacts

Hazardous materials and risk of upset conditions are largely site-specific, and would occur on a case-by-case basis for each individual project affected, in conjunction with site disturbance, structure demolition, and development proposals on these properties. All new developments in the City are required to evaluate potential threats to public safety, including those associated with the accidental release of hazardous materials into the environment during demolition, construction and operation, emergency response, transport/use/disposal of hazardous materials, and hazards to sensitive receptors (including schools).

Implementation of the regulatory compliance measures discussed in this section, and the above mitigation measures will reduce the proposed Project's potential impacts associated with the accidental release of hazardous materials during demolition, construction and operation as well as emergency response to less-than- significant levels, such

that the proposed Project would not combine with any of the related projects to cause a cumulatively significant impact. Further, each related project would be required to follow local, State and federal laws regarding hazardous materials and other hazards. Therefore, with compliance with local, State and federal laws pertaining to hazards and hazardous materials, cumulative impacts would be less than significant and not cumulatively considerable.

2.10 Hydrology and Water Quality

2.10.1 Introduction

This section describes existing hydrological conditions, including groundwater, surface water, water quality, stormwater, and flooding conditions within the Project area and evaluates potential impacts to hydrology and water quality that could result from implementation of the HBFC PDP Project. The analysis in this section is based on the review of existing resources, applicable laws and regulations, and the following technical reports prepared for the proposed Project:

- Preliminary Hydrology Report[1] (Appendix F)
- Water Quality Management Plan[2] (Appendix I)

2.10.2 Thresholds of Significance

The following thresholds or criteria are those recommended in §15064.7 of the CEQA Guidelines and Appendix G of the Guidelines, and are used to determine if and to what extent a project may have a potentially significant impact on area hydrology and water resources. The Project would have a significant effect if it would:

a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality.

b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

   i) result in substantial erosion or siltation on- or off-site;

   ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;

   iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or

   iv) impede or redirect flood flows?

d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

[1] Preliminary Hydrological Report for the Betty Ford Center Expansion, prepared by Michael Baker International, October 24, 2019.

[2] Preliminary Water Quality Management Plan for the Betty Ford Center Building Expansion, prepared by Michael Baker International, September 2019.

2.10.3 Regulatory Framework

State

Porter-Cologne Water Quality Control Act

The Porter-Cologne Water Quality Control Act (Division 7 of the California Water Code) is the primary statute covering the quality of waters in California. Under the act, the State Water Quality Control Board (SWRCB) has the ultimate authority over the State's water quality policy. The SWRCB administers water rights, water pollution control, and water quality functions throughout the state, while the nine Regional Water Quality Control Boards (RWQCBs) conduct planning, permitting, and enforcement activities. The RWQCBs also regulate water quality under this act through the regulatory standards and objectives set forth in Water Quality Control Plans (also referred to as Basin Plans) prepared for each region. The most current version of the Colorado River Region Basin Plan includes amendments adopted through January 2019. The Basin Plan has five major components:

1. Identifies the waters of the region;
2. Designates beneficial uses of those waters;
3. Establishes water quality objectives for the protection of those uses;
4. Prescribes an implementation plan; and
5. Establishes a monitoring and surveillance program to assess implementation efforts.

Senate Bill 610

Senate Bill 610, codified in the California Water Code, Sections 10910 et seq., became effective January 1, 2002. Senate Bill 610 requires counties and cities to consider the availability of adequate water supplies for certain new large development projects. These statutory provisions include requirements for both water supply assessments and Urban Water Management Plans (UWMP) applicable to the California Environmental Quality Act (CEQA) process. Senate Bill 610 requires that for specified projects subject to CEQA, the urban water supplier must prepare a water supply assessment (WSA) that determines whether the projected water demand associated with a proposed Project is included as part of the most recently adopted UWMP. Specifically, a water supply assessment shall identify existing water supply entitlements, water rights, or water service contracts held by the public water system, and prior years' water deliveries received by the public water system. In addition, it must address water supplies over a 20-year period and consider average, single-dry, and multiple-dry years. In accordance with Senate Bill 610 and Section 10912 of the California Water Code, projects subject to CEQA requiring submittal of a water supply assessment include the following:

- Residential developments of more than 500-dwelling units.
- Shopping center or business establishment employing more than 1,000 persons or having more than 500,000 square feet of floor space.
- Commercial office buildings employing more than 1,000 persons or having more than 250,000 square feet of floor space.
- Hotels, motels, or both, having more than 500 rooms.
- Industrial, manufacturing, or processing plant, or industrial park of more than 40 acres of land, more than 650,000 square feet of floor area, or employing more than 1,000 persons.
- Mixed-use projects that include one or more of the projects specified in this subdivision.
- A project that would demand an amount of water equivalent to or greater than the amount of water required by a 500-dwelling unit project.

The water supply assessment must be approved by the public water system at a regular or special meeting and must be incorporated into the CEQA document. The lead agency must then make certain findings related to water supply based on the water supply assessment. The proposed PDP Project does not meet the thresholds requiring a Water Supply Assessment per Senate Bill 610.

Senate Bill 221

Senate Bill 221 (SB 221) was enacted in 2001 and became effective as of January 1, 2002. SB 221 amends Section 11010 of the Business and Professional Code, and amends Section 65867.5 to add Sections 66455.3 and 66473.7 to the Government Code. SB 221 establishes the relationship between the WSA prepared for a project and project approval under the Subdivision Map Act. Pursuant to California Government Code Section 66473.7, the Public Water Supplier must provide a written water supply verification (WSV) demonstrating sufficient water supply prior to the approval of a new subdivision.

SB 221 states that "a WSV is required prior to the approval of a tentative subdivision map, or a parcel map for which a tentative map was not required, or a development agreement for a subdivision of property of more than 500 dwelling units, except as specified, including the design of the subdivision or similar type of improvement." The proposed Project does not include a Tentative Parcel Map and, therefore, a WSV is not required.

California Code of Regulations

Title 24, Part 5 of the California Code of Regulations (CCR), establishes the California Plumbing Code, which was last updated in 2019 and became effective January 1, 2020. The California Plumbing Code sets forth efficiency standards (i.e., maximum flow rates) for new plumbing fittings and fixtures, including showerheads and lavatory faucets. Section 1605.3(h) establishes State efficiency standards for non-federally regulated plumbing fittings, including commercial pre-rinse spray valves.[3]

On January 17, 2014, the Governor proclaimed a State of Emergency and on April 1, 2015, the governor issued Executive Order B-29-15, which ordered the California State Water Resources Control Board (SWRCB) to adopt emergency regulations imposing restrictions to achieve a 25 percent reduction in potable urban water usage across the State. Agencies assigned to Tier 9, including CVWD, having residential water use above 215 gallons per capita per day (gpcd), were required to reduce water use by 36 percent compared to 2013 water use. This reduction was reduced to 32 percent in February 2016 and became locally implemented in May 2016.

Following an above normal snowpack in northern California, on May 9, 2016, Governor Brown issued Executive Order B-37-16 that focused on long-term water use efficiency. In response to that order, the SWRCB adopted revised emergency regulations in May 2016 that transition the mandates away from demand-based regulations. Under the new regulations, individual districts will self-certify the level of available water supplies assuming three additional dry years and the level of conservation necessary to assure adequate supply over that time. It is anticipated that the new self-certification process will result in a reduction in the emergency mandatory reduction target imposed on CVWD by the SWRCB. Even though the State is out of the "exceptional drought" designation, CVWD and other agencies continue to control overdrafts in the subbasins by implementing water management and landscape policies, and prohibiting wasteful water use.[4]

Local

Coachella Valley Water District (CVWD) Ordinance No. 1302

CVWD mandates efficiency in newly installed landscape irrigation systems via Ordinance No. 1302 (Valley-wide Water Efficient Landscaping Model Ordinance). CVWD's ordinance is significantly more stringent than the State model ordinance. This ordinance establishes effective water-efficient landscape requirements for newly installed and rehabilitated landscapes. The ordinance also implements the requirements of the State of California Water Conservation in Landscaping Act. Most cities in the Coachella Valley have adopted the CVWD ordinance or a version thereof; some have adopted more stringent or completely different ordinances.

[3] 2019 California Plumbing Code, California Code of Regulations, Title 24, Part 5. Effective January 1, 2020.

[4] State Water Resources Control Board Website - Emergency Conservation Regulation, https://www.waterboards.ca.gov/water_issues/programs/conservation_portal/emergency_regulation.html, accessed January 2020, page last updated March 2018.

Rancho Mirage Municipal Code

Rancho Mirage Municipal Code Chapter 17.24, Landscaping Standards, establishes water efficiency requirements for new development and mandates installation of high efficiency landscaping. This code is consistent with the CVWD's Ordinance No. 1302 and is established to minimize wasteful water use in landscaping.

In addition, the City requires on-site retention on undeveloped properties of one gross acre or more in size and which are located norther of the Whitewater River Stormwater Channel. Projects fitting this description shall, upon development, provide sufficient on-site stormwater retention for the volume of runoff resulting from a one-hundred-year storm with a time duration which generates the maximum stormwater volume. According to the Municipal Code, stormwater runoff and volume calculations, retention location and method of storage shall be performed to the satisfaction of the City engineer (Municipal Code Section 13.05.010).

Rancho Mirage General Plan

The following General Plan policies are relevant to the proposed Project:

Policy COS 7.1: The City shall encourage the use of drought tolerant landscaping as a means of reducing water demand.

Policy COS 7.2: Evaluate all proposed land use and development plans for their potential to create groundwater contamination hazards from point and non-point sources and confer with other appropriate agencies to assure adequate re-view

Policy COS 7.4: Require the use of alternative water supplies, such as recycled or canal water, for urban irrigation, where available.

Policy COS 7.5: Require new developments to establish and confirm the ability to meet current and future water resource demands.

Policy SAFE 2.3: The City shall provide direction and guidelines for the development of onsite stormwater retention/detention facilities consistent with local and regional drainage plans and community design standards.

Policy SAFE 2.4: The City shall cooperate with FEMA, when necessary, to amend Flood Insurance Rate Maps for areas in the city boundaries and SOI.

Policy SAFE 2.7: Development proposals located in areas that are subject to flooding shall be evaluated to minimize the exposure of life and property to potential flood risks. All development proposed on lands of one acre or larger shall be designed such that all stormwater to the level of a 100-year frequency storm, worst case of the 3, 6, 12, or 24-hour duration, shall be retained onsite.

2.10.4 Environmental Setting

The climate conditions in the Coachella Valley are characterized as "subtropical desert." Mean annual rainfall is very low on the desert floor and into the foothills, ranging from 2 to 4 inches per year on the valley floor and averaging about 5 to 6 inches along the foothills. Generally, temperatures decrease and precipitation increases with increasing elevation. In some years, no measurable rainfall has been reported on portions of the valley floor. Most of the valley's rainfall occurs during the cooler months of November through March, but occasional high-intensity thunderstorms and tropical storms occur in late summer and early fall. Although the ground may be generally dry at the beginning of a storm, sufficient amounts and intensities of rainfall can saturate the surface, substantially reducing percolation and increasing runoff.

Four types of storm events (i.e. general winter storms, combining high-intensity rainfall, rapid melting of the mountain snowpack, and summer thunderstorms) cause flooding in the Coachella Valley. Summer storms pose a greater threat of localized flooding than winter storms because of their high intensity and short duration of rainfall. Monsoons, and warm winter storms with snowmelt, can generate significant runoff over a much larger area.

2.10.5 Existing Conditions

Regional Surface Water Hydrology

The Project site is located at the southwesterly boundary of the Colorado River Hydrologic Region (HR) in the Whitewater River Hydrologic Unit (HU) and falls under the jurisdiction of the Colorado River Regional Water Quality Control Board (Region 7). Within the Whitewater River Hydrologic Unit, the Project site lies in the Whitewater River watershed. Much of the watershed consists of sparsely populated mountains, desert, and agricultural lands. Urbanized areas are principally located on the Coachella Valley floor between Banning and Indio along Interstate 10, and from Palm Springs to Coachella along State Highway 111.

In the Coachella Valley, the Whitewater River is the principal drainage course; it is typically dry, but flows southeasterly when it carries water. The Whitewater River has a total drainage area of approximately 850 square miles and drains areas as far away as the summit of Mount San Gorgonio and the steep southern and eastern slopes of the Little San Bernardinos.

Local Flooding

Flooding is a general or temporary condition of partial or complete inundation of normally dry land areas. The Coachella Valley is an arid desert region averaging four to six inches of rain per year. However, the surrounding mountains are subject to much higher rainfall rates which can produce unpredictable, damaging, and even deadly flash flooding events throughout the valley.

Stormwater flows and flash runoff from the Indio Hills and the foothills of the San Jacinto and San Bernardino Mountains generate flooding hazards in the City. The Project site is located within FEMA Flood Zone X, which designates such areas as subject to a 500-year flood threat (0.2% chance of flooding in any given year). Zone X also delineates areas of potential 100-year flooding with average depth of less than 1 foot, or with drainage area less than 1 square mile; or areas protected from a 100-year flood by levee.

Stormwater Management Plan

Proposed Project improvements will occur on both the currently developed portions of the HBFC campus and its easterly vacant 6-acres located along the eastern boundary. Proposed activities on the existing developed HBFC campus include the demolition of four residential buildings and construction of two new residential buildings. In addition, a new 22,748 square foot day-treatment building is proposed on vacant lands west of Vista Del Sol, which forms the east boundary of the HBFC site. On the currently developed portions of the HBFC campus, overall impervious area would be reduced compared to the current condition, and will therefore generate storm runoff lower than current conditions and will not require additional peak flow mitigation. Stormwater flows on the existing HBFC site would continue to drain to the pond located on the southwestern portion of the site.

The proposed eastern expansion would increase impervious surfaces, result in an increase is stormwater runoff when compared to the current condition, and requires on site peak flow management. To address this new source of stormwater runoff the proposed Project provides for two new retention basins to be located in the southeast portion of the site on either side of the new access road at the south side of the site (see Exhibit 1-5).

Water Resources

The Whitewater River Groundwater Basin underlies the valley which generally extends from the Whitewater River in the northwest to the Salton Sea in the southeast. The aquifer is naturally subdivided by fault barriers into subbasins, which are further divided into subareas. Desert Water Agency (DWA) and the Coachella Valley Water

District (CVWD) jointly utilize and manage a replenishment program for the local groundwater basin, the Upper Whitewater River Subbasin. With very limited exceptions, domestic water is supplied from wells pumping groundwater. Estimates of groundwater storage in the Upper Whitewater River Subbasin range from 10.5 to 14.2 million acre-feet. In total, the subbasins underlying the Coachella Valley contain approximately 39.2 million acre-feet of water in storage, of which about 28.8 million are within the Whitewater River Subbasin. Natural recharge from precipitation and runoff, supplemented with artificial recharge from imported Colorado River, State Water Project water, and recycled water from wastewater treatment plants also provide water to the Coachella Valley.

According to the CVWD's 2015 UWMP, CVWD anticipates using treated Canal water as an urban potable supply starting in 2025 to reduce the amount of groundwater pumping; by 2040, Canal water is projected to meet 28 percent of total urban potable demand, while the rest is met by groundwater. CVWD also intends to supply untreated Canal water and desalinated semi-perched brackish groundwater for urban landscaping to offset groundwater pumping. Recycled water currently serves golf customers, with a small portion of the total recycled water supply serving Homeowners' Associations (HOAs) and minor landscapers totaling less than 400 AFY. The projected growth in recycled water supplies consists of golf and agriculture customers that are currently served by private groundwater wells.

Water Quality

Groundwater quality in the Coachella Valley varies with depth, proximity to faults and recharge basins, presence of surface contaminants, and other hydrogeological or human factors. CVWD conducts water quality monitoring in accordance with federal and state drinking water requirements and analyzes water samples for more than 100 regulated and unregulated substances. Based on the most current water quality report (CVWD 2018-2019), drinking water delivered from CVWD's potable water system supplied from groundwater wells complies with all state and federal drinking water quality regulations.[5]

Two naturally occurring substances, arsenic and chromium-6, are among the over 100 constituents that are monitored in the Coachella Valley's groundwater supply. CVWD treats some of its groundwater wells to reduce arsenic and chromium-6 levels in the drinking water supply and is conducting ongoing water treatment efforts to reduce chromium-6 levels delivered from groundwater wells.

2.10.6 Project Impacts

This section analyses the potential impacts of the proposed HBFC PDP Project, which would have a significant impact on the environment if it would:

a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality.

Less than Significant with Mitigation. A project would normally have a significant impact on surface water quality if discharges associated with the project would create pollution, contamination, or nuisance as defined in Section 13050 of the California Water Code (CWC) or would cause regulatory standards to be violated, as defined in the applicable National Pollution Discharge Elimination System (NPDES) stormwater permit or Water Quality Control Plan for the receiving water body. The proposed Project site is located in the Whitewater River watershed which drains into the Salton Sea and is part of the larger Colorado River Watershed. All water providers in the watershed, including CVWD, are required to comply with the State Regional Water Quality Control Board (SWRCB) standards for the protection of water quality.

[5] Coachella Valley Water District 2018-2019 Water Quality Report Annual Review Report.

Construction

The Project is required to comply with a number of regulations designed to reduce or eliminate construction-related water quality effects, including the NPDES General Construction Activity Stormwater Permit, which regulates stormwater discharges to surface waters. Under the NPDES, the proposed Project Applicant is responsible for preparing a Storm Water Pollution Prevention Plan (SWPPP) to mitigate the effects of erosion and the inherent potential for sedimentation and other pollutants entering the stormwater system. The SWPPP must include erosion and sediment control BMPs that would meet or exceed measures required by the determined risk level of the Construction General Permit. A construction site monitoring program that identifies monitoring and sampling requirements during construction is a required component of the SWPPP.

In addition, the City of Rancho Mirage Stormwater Management and Discharge Control Ordinance (Municipal Code Chapter 7.03) specifies Storm Water and Urban Runoff Pollution Control, which require the application of Best Management Practices (BMPs). A Preliminary Water Quality Management Plan (WQMP) was prepared for the proposed Project which includes BMPs specific to the Project (See Appendix I).

Operation

The proposed Project provides for on-site stormwater management, treatment and storage. The site has been graded to provide a series of high point and low point collection locations designed to proportionately collect and convey runoff to different portions of the site. Stormwater runoff will flow from the northern property boundary in a southern direction towards the proposed day treatment facility. From there, flows will continue south towards the retention basins via a series of storm drains and catch basins located along the western boundary of the site adjacent to the day treatment facility and under the proposed access road, and/or via surface flows along the eastern boundary.

The proposed retention basins have been designed to retain 100 percent of stormwater flows from a 100-year storm event per City requirements. Rainfall data for the 100 year 3- , 6-, and 24-hour storms were input into the Shortcut Method Synthetic Unit Hydrograph spreadsheet per the Riverside County Flood Control and Water Conservation District's (RCFC&WCD) Hydrology Manual. Peak flows were calculated using the RCFC&WCD Rational Method Calculation for sizing the retention basins. Combined, the retention basins have been designed to contain 53,209 cubic feet of stormwater runoff, which will adequately contain 100 percent of stormwater flows from a 100-year storm event (See Appendix F, Hydrology Report, for detailed calculations).

The retention basins will provide natural infiltration to remove pollutants from stormwater runoff, including oil and grease, bacteria, sediment, nutrients, trash, metals, and organic materials. The retention/infiltration basins will store runoff until it gradually exfiltrates through the soil and eventually into the water table, which also promotes groundwater recharge. Proposed landscaping will also provide additional bioremediation by naturally detoxifying potential stormwater contaminants.

Summary

The proposed retention basins have been designed to retain 100 percent of stormwater flows from a 100-year storm event per City requirements. The Project has been designed to comply with NPDES regulations and the BMPs set forth in the Project-specific WQMP, which minimize the pollutant load associated with urban runoff during construction and operation. Best management practices include, but are not limited to, incorporating landscaping into the drainage design, designing retention basins that act as a natural filtration system, preserving natural drainage features and systems, and minimizing the use of impervious surfaces through decorative site design.

The imposition of conditions of approval, local, and state standard requirements and the requirements of the law will assure that the Project will not violate any water quality standards or waste discharge requirements. Compliance with the NPDES General Construction Activity Stormwater Permit the implementation of Mitigation Measures HYD-1 and HYD-2, Project impacts would be less than significant.

b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

Less than Significant Impact. The proposed Project will require water for domestic use and landscape irrigation. To calculate the Project's water demand, water demand factors were derived from the American Water Works Association Research Foundation (AWWARF) and CVWD, including recently approved WSA's. For analysis purposes, a residential water demand was used to characterize the water demands associated with the residential halls and day treatment rooms, and general office water demands were assumed for the proposed administration space. As shown in Table 2.10-1, the proposed Project will demand approximately 28 AFY at buildout.

Table 2.10-1
HBFC PDP Project Water Demands

Land Use	Unit		Factor		Gallons/ Day	Acre-feet/Year (AFY)
	Beds	SF	Quantity	Basis		
Residential/Treatment[1]	56		117.7	Gallons/bed/day	6,591.20	7.38
Admin/Office [2]		22,748	0.19	Gallons/SF/day	4,322.12	4.84
Landscaping	*See Table 2.10-2 for Calculations*					15.62
					Total Water Demand	27.85

Source:
1. Residential demand based on the water demand factors for similar types of development in recent CVWD-approved WSAs PD 80 Project's Residential Water Demand Factor. Approved 11/25/2014.
2. Water Demand Factor for general office use (0.19 gallons per square foot per day) based on American Water Works Association Research Foundation (AWWARF), Commercial and Institutional End Uses of Water. 2000.

According to the Preliminary Water Use Calculations prepared for the proposed PDP landscape improvements, approximately 42,850 square feet of turf will be replaced on the existing HBFC campus after reconstruction of the new residential halls, and 328,370 square feet of native, drought tolerant shrubs and trees will be added to the PDP expansion site.[6] For analysis purposes, only water demands from newly proposed, low to moderate water demand landscaping will be considered as Project impacts because the replacement turf would not constitute a new water demand, as the Project does not propose new turf areas.

Table 2.10-2
Landscaping Water Demand: Estimated Total Water Use (ETWU)

Landscaping	ETo	PF	Area (SF)	Conversion Factor (gal/SF)	Conversion Factor (CCF)	IE	ETWU (CCF)	ETWU (AFY)
Low to Moderate Water Demand Palette	75	0.3	328,370	0.62	748	0.9	6,804.46	15.62

The Project site is located within the CVWD service area, where urban water demands are estimated to grow from 114,600 AFY in 2020 to 194,300 AFY in 2040[7]. The net total water demand for this part of the Project is expected to be 28 AFY. This represents approximately 0.02 percent of the total projected water supply of 114,600 AF for 2020, and would represent 0.01 percent of the total projected water supply of 194,300 AF for 2040.

6 Preliminary Water Use Calculations for the Betty Ford Center Capital Expansion Project prepared by Community Works Design Group. Personal communication with Kay Kite, Irrigation Designer, 2/10/2020.
7 CVWD Urban Water Management Plan Final Report, July 1, 2016.

The subject property is designated P/H (Hospital) on the City General Plan land use map and zoning map, and is also subject to the provisions of the Eisenhower Medical Center Specific Plan. The proposed renovations and expansion is consistent with this land use. CVWD works with the cities within its jurisdiction to update its urban water management plan every five years. Since, the Project is consistent with the General Plan's land use, its water demand would not be excessive, would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge. In addition, the site is designed to contain, store, and treat stormwater runoff via two retention basins that will allow stormwater to percolate back into the groundwater table.

To reduce water waste, the City of Rancho Mirage has adopted a water efficient landscaping ordinance as part of its Municipal Code that addresses all landscaping for residential and non-residential developments, public parkways, median islands, and landscaping maintenance requirements in the City. The ordinance was adopted in accordance with CVWD's Ordinance 1302.3. The guidelines used by the City encourage use of low water demand plants for landscaping. Per the Preliminary Water Use Calculations prepared for the PDP, proposed landscaping includes lower to moderate water use plants such as succulents, grasses, cacti, shrubs, groundcover, and a variety of trees. In addition, new landscaping water demands could potentially be met through recycled water pumped from the existing pond located on the southwestern portion of the HBFC site, further reducing the Project's overall water demand.

In summary, the proposed Project will increase CVWD's 2020 baseline water demand by 0.02 percent. This represents a negligible increase in water demand that is associated with planned development within the City's General Plan, Eisenhower Medical Center Specific Plan, and CVWD UWMP. Therefore, Project impacts associated with domestic water demand are expected to be less than significant. The project will connect to water lines already serving the existing HBFC campus. No new wells or additional water infrastructure are proposed beyond the extension of existing lines within the HBFC campus. The Project complies with the local water-efficiency requirements, including the use of drought-tolerant planting materials and recycled landscaping irrigation. Implementation of the applicable requirements and guidelines discussed above will assure that water-related impacts remain at less than significant levels.

c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

i) result in substantial erosion or siltation on- or off-site;

ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;

iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or

Less than Significant Impact. The HBFC campus is approximately 75 percent developed. Development of the proposed PDP Project will result in the remaining 6± acres disturbed and graded. As with the developed portions of the campus, the new improvements will include large areas of open space that will not generate an increase in runoff. Approximately 40-50 percent of the currently vacant site will be constructed with impermeable surfaces and proposed on-site facilities will meet City standards, which require the developer to retain 100 percent urban stormwater runoff on site. There are currently two existing retention basins on-site that serve the needs of the current HBFC campus, one of which also serves as an irrigation pond and the second located in the parking area to the east. The proposed Project improvements include the removal of four single-story residential buildings and replacing these with two 2-story buildings. The proposed single-story day-treatment building will be located west of Vista Del Sol on a portion of the currently vacant east area of the campus site. Two new retention basins will also be constructed immediately south of the day-treatment building and on either side of the proposed Vista Del Sol access drive. The eastern expansion area will be revegetated with a low to moderate water demand native mix of succulents,

cacti, groundcover, shrubs and trees and will generate no new runoff. The net new development of impermeable surfaces and the volumes they will generate in the prescribed design storm were analyzed in the Project preliminary hydrology report.

As discussed under threshold a), above, the two proposed retention basins have been sized to store the 100-yr 24-hour design storm volume in accordance with City standards and regulations. The depth to groundwater in the vicinity is approximately 195 feet. Vegetation within and adjacent to the retention basins will serve as a measure of bio-remediation and the depth of the soil column ensure that neither surface not groundwater quality will be affected by the project's stormwater runoff. The Project will not substantially increase the rate of surface runoff, and proposed stormwater management will preclude flooding either within the HBFC campus or off-site, and neither surface nor groundwater quality will be compromised.

With the provision of on-site stormwater retention and implementation of required BMPs (Mitigation Measures HYD-1), no significant or substantially increased rate or amount of surface runoff will occur that would result in flooding or siltation on- or offsite. Impacts are less than significant.

iv) impede or redirect flood flows?

Less than Significant Impact. As previously stated in the IS/NOP, construction of the proposed Project is not expected to impede or redirect flood flows either generated on site or in the Project vicinity. A new block wall is proposed along the currently vacant six-acre portion of the campus and along Vista Del Sol. Upstream tributary flows are from the northwest and have been cut off from the HBFC campus by the EMC campus and the Rancho Mirage Country Club development. North and east of the site, area-wide flows are northwest to southeast and is limited to now isolated, small drainages. The proposed Project will not be required to accommodate nor will they redirect storm flows tributary to this site. On-site runoff will be retained on site via two new retention basins, and improvements to Vista Del Sol will ensure that the City's system of surface runoff conveyance is properly constructed and maintained.

d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

Less than Significant Impact. The HBFC campus includes a shallow one-acre landscape/irrigation pond located in the southwest corner of the campus. Although there is a potential for this pond to generate waves in a strong seismic event, the extent of such sloshing is expected to be minimal. Furthermore, there are no hazardous materials in proximity of the pond that could be affected by local pond inundation. With this exception, the proposed Project site is not located in the vicinity of a large water body, including water storage tanks, debris basins or dams. No hazard from dam failure, tsunami or seiche exists or is de minimis. The Project site is located within FEMA Flood Zone X, which is a non-special flood hazard zone with moderate- to low-risk of flooding. Impacts will be less than significant.

e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Less Than Significant. The proposed Project has been designed and includes facilities that will safely capture and convey stormwater runoff to properly designed retention facilities, where bio-remediation and percolation will ensure that neither surface nor groundwater resources are adversely affected. As previously discussed under threshold a), above, the proposed Project has been designed in conformance with applicable water quality regulations of the City of Rancho Mirage and the Regional Water Quality Control Board. A WQMP has been prepared for this Project (see Appendix I) and further ensures that the Project will not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

2.10.7 Mitigation Measures

HYD-1 BMPs, as described in the Project-specific WQMP, shall be implemented to ensure that water quality impacts resulting from the Project meet the City's NPDES standards.

HYD-2 The Project shall be subject to NPDES Construction General Permit requirements.

2.10.8 Significance After Mitigation

With implementation of the above-described Mitigation Measures, impacts to hydrology and water quality would be reduced to less than significant levels.

2.10.9 Cumulative Impacts

The proposed Project will make no new net contribution to local or regional stormwater management or facilities. The Project will no convey on-site runoff to off-site facilities or properties. The Project will not be required to accommodate, take on or convey any tributary flows. With the proposed on-site stormwater retention facilities, the project will have a very limited and de minimis effect on local surface and groundwater quality, and its contribution to cumulative effects on storm drainage and water quality and not cumulatively considerable.

2.11 Land Use/Planning

2.11.1 Introduction

This section describes the existing land uses at and in the vicinity of the project planning area, and evaluates the compatibility of and potential impacts on those land uses from the proposed Project. Land use regulations that address land use planning in the study area are provided for evaluation of land use compatibility. Potential land use impacts from project construction and operation are evaluated. Design elements that serve to avoid or minimize impacts are described, as are mitigation measures that would avoid or reduce impacts. The proposed Project is not located within or adjacent to a Conservation Area established by the Coachella Valley Multiple Species Habitat Conservation Plan (MSHCP). Please refer to Section 2.5 Biological Resources for a comprehensive resource-based discussion of the proposed Project's potential effects on species and habitats covered by the MSHCP.

2.11.2 Thresholds of Significance

The thresholds of significance analyzed herein have been taken from Appendix G of the State CEQA Guidelines. For purposes of this EIR, the proposed Project would have a significant effect on existing and planned land use if it were to:

a) Physically divide an established community.

b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

2.11.3 Regulatory Framework

There are a limited number of federal or state land use regulatory plans that are relevant to the subject Project. These include regional habitat conservation plans such as the Coachella Valley Multiple Species Habitat Conservation Plan (CVMSHCP), which is a federal, state and local habitat management plan. Finally, county and local General Plans and implementing planning documents also establish and regulate the land use pattern on non-federal lands. These plans are briefly discussed below.

Federal

No relevant federal regulations.

State

There are no state regulations that address or affect the selection of locations for or the use of drug and alcohol treatment facilities as a land use.

Regional/Local

The Rancho Mirage General Plan is the primary local planning documents regulating land uses on non-federal lands in the City. The following sets forth goals and policies from the City's General Plans that are relevant to the proposed Project.

City of Rancho Mirage[1]
The subject property is designated *Hospital (P/H)* on the City of Rancho Mirage General Plan Land Use Map. Applicable General Plan goals and policies are set forth below.

[1] Rancho Mirage General Plan, 2017.

Land Use Element

Goal LU 2 A balanced mix of functionally integrated land uses, meeting the general social and economic needs of the community through simplified, compatible, and consistent land use and zoning designations.

Policy LU 2.6 The City shall ensure privacy and safety for residential neighborhoods by providing adequate buffering and screening, particularly where neighborhoods adjoin or are integrated with commercial developments.

Goal LU 5 Institutional uses that are efficiently located to serve the community and are compatible with surrounding land uses.

Policy LU 5.1 Institutional uses and facilities shall be developed in a manner that assures adequate levels of service, while remaining compatible with existing and future land uses.

Noise Element

Policy N.1.2: Noise sensitive land uses, including residences, resorts, community open space, schools, libraries, churches, hospitals, and convalescent homes, shall be protected from high noise levels emitted by both existing and future noise sources.

Public Services and Facilities Element

Goal PS&F 8 High quality of health care facilities and services to pro-mote the good health and well-being of Rancho Mirage's residents.

Policy PS&F 8.1 Coordinate with all medical service providers to assure adequate health care facilities and services to meet the needs of Rancho Mirage's residents.

Policy PS&F 8.2 Encourage the development of medical and health care facilities that address the changing demographics and the City's desire to expand the economic base of the community.

Policy PS&F 8.3 The EMC Specific Plan shall serve as the development guide for the campus.

Eisenhower Medical Center Specific Plan[2]

The Hazelden Betty Ford Center is located within the boundaries of the Eisenhower Medical Center Specific Plan, which was originally adopted in 1987 by Rancho Mirage City Council Ordinance 397 and is amended by ordinance. The EMC Specific Plan was implemented with General Plan Amendment No. 87-GPA-67 and Zone Change No. 87-ZC-59 and has been revised and updated. SPA 2D specifically guides development of the HBFC campus, while campus development has also proceeded under other amendments to the EMC Specific Plan.

With buildout of the proposed PDP Project, square footage on the HNBC campus will total 170,124 square feet. The EMC Specific Plan makes provision for up to 213,018 square feet of development upon buildout of the HBFC campus[3]. The EMC Specific Plan serves as the zoning ordinance for the subject property. All other City codes and ordinances continue to be applicable. Proposed development plans, agreements, site plans, tentative tract maps or parcel maps, and any other development approval must be consistent with the EMC Specific Plan.

2 Eisenhower Medical Center Specific Plan, prepared by Moon Mayoras Architects, November 2002, as amended. The provisions of EMC Specific Plan 2D are applicable to the HBFC campus.

3 Ibid.

2.11.4 Environmental Setting

The City and the Coachella Valley are located in the central portion of Riverside County at the westernmost limits of the Sonoran Desert, also known as the Colorado Desert. The San Jacinto Mountains and San Bernardino Mountains form the western portions of the valley, while the Little San Bernardino and Santa Rosa Mountains form the northern and southern boundaries, respectively. Much of the urbanization in the City and valley has initially taken place along the toe of the slopes of the Santa Rosa and San Jacinto Mountains, and has spread progressively onto the valley floor and southeastward from the Palm Springs area through Coachella to the communities of Thermal and Mecca.

The region is noted for prime agricultural lands in the eastern valley areas, and for resort residential and world-class tourist developments primarily in the western and central portions of the valley, although this trend is continuing to move east. In the western portions of the valley, including Rancho Mirage, agriculture developed (primarily dates and citrus) early in the 20th Century gave way to resort, residential and commercial development. The area's natural assets, including mountain views, varied wildlife and sunny weather, and a dependable water supply, have become progressively important to the local economy and environment, and have contributed to the region's character and desirability.

The City and region are served by major transportation arteries, including US Interstate-10, Highway 111, Highways 74, 62 and 86, and the Union Pacific Railroad, which (as Southern Pacific Railroad) was primarily responsible for opening up the area in the mid-1800s. The Palms Springs International Airport and secondary general aviation facilities also serve the area.

2.11.5 Existing Conditions

The Hazelden Betty Ford Center campus is comprised of 26.22± acres located at the eastern end of the larger Eisenhower Medical Center campus, which extends from Vista Del Sol on the east to Bob Hope Drive on the west. The subject HBFC property is bounded by Vista Del Sol on the east, low density residential development to the south, and to the north by portions of the EMC campus and fairways and condominiums within the Rancho Mirage Country Club development beyond. The subject property is designated Hospital (P/H) on the City General Plan land use map and zoning map, and is also subject to the provisions of the Eisenhower Medical Center Specific Plan.

Existing Land Use
Groundbreaking for the initial Eisenhower Medical Center campus was in late 1969, which included mass grading of the western portion of the existing Hazelden Betty Ford Center campus. Until that time, the entire site was native desert bounded by Bob Hope Drive on the west. The EMC and HBFC campus site was subsequently expanded to extend east to the future Vista Del Sol on the east. By 1984, much of the existing EMC and HBFC campuses had been constructed, as had the Wilshire Palms development to the south and Rancho Mirage Country Club to the north. Today, all but approximately 6 acres of the 26.22± acre HBFC campus has been developed. The remaining vacant lands are located along the west side of Vista Del Sol. (See Exhibit 1-4 Project Planning Area Map).

Surrounding Development
As noted throughout this EIR, the subject property is located in an area that is still undergoing development primarily with low density residential. EMC campus development in proximity to the HBFC campus include the Barbara Sinatra Children's Center to the immediate north, the Bannon medical building to the west and the Lakeview Medical Building to the northwest. The undeveloped portions of the Eisenhower Medical Center campus include lands north of the HBFC site and extend to Vista Del Sol. Some of these vacant EMC lands, which total approximately 9.95 acres, are currently being used for construction staging in support of nearby on-campus EMC building expansions, while the easterly 8.50± acres are vacant and undeveloped.

North and beyond the EMC campus is the golf course residential development of Rancho Mirage Country Club. This project was constructed in the early 1980s and is comprised of attached single family homes oriented around a golf course. The nearest home to proposed new construction on the HBFC campus is approximately 850 feet north and separated by intervening EMC campus development, a tall boundary hedge and other landscaping, and a golf course fairway of the Rancho Mirage Country Club.

South of the HBFC site are developed and partially developed residential lands, including the Wilshire Palms subdivision and a newly subdivided parcel comprised of four one-acre lots.

East of the subject property are vacant five-acre parcels that are designated Residential Estate with maximum development densities of one dwelling unit per acre. North of the subject property, the nearest developed parcel along Vista Del Sol is approximately one-quarter mile to the north. To the southeast and on the east side of Vista Del Sol lands have been subdivided, are within walled and gated areas, and are for sale. Farther east and along the west side of Vista Dunes Road additional one-acre lot development has occurred and these lands are approximately 85% built out.

2.11.6 Project Impacts

The proposed PDP application would remove four existing one-story residential inpatient buildings located on the west side of the HBFC campus and replace them with two two-story residential building at the same general location, as described in detail in Section 1 of this EIR. The proposed Project would also include construction of a new, one-story day-treatment building, which would be located approximately 100 feet west of Vista Del Sol and 240± feet north of the HBFC south property line. In this area a new access drive is also proposed on Vista Del Sol to provide primary access to the HBFC campus (see Exhibit 1-5 Project Site Plan), which is currently accessed solely via the internal roadway network of EMC. The Project will be a major capital investment, will generate approximately 21 new full-time jobs and will enhance HBFC's services.

PDP development would also involve the extension of a new access drive from the aforementioned Vis Del Sol access, which would extend in a circuitous route to the curvilinear road accessing the HBFC admissions building. Site landscaping would be converted, in part, to desert and/or drought-tolerant plantings and the ficus hedge currently applied on site and at the EMC campus would also be extended. Parking areas will also be redistributed and new shade structures are proposed, largely in the same location as the existing shade structures.

a) Physically divide an established community.

No Impact. The subject HBFC campus is a contiguous land holding that extends east from Vista Del Sol to the boundaries of the EMC campus to the west. While separate service providers with different missions, these two institutions have been sharing the same campus and the same infrastructure since the inception of the Betty Ford Center in 1982. The development and operation of residential communities and other residential development in the area have not been affected by the HBFC campus and will not be affected by the implementation of the proposed PDP Project. Therefore, the proposed Project will not divide an established neighborhood or community.

b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

Less Than Significant. As noted, the proposed Project is an expansion of capital improvements allowed under the City General Plan and the EMC Specific Plan. The proposed Project is functionally integrated with the EMC campus and other surrounding development and will facilitate the HBFC mission in meeting the social and psychological health needs of the community. The Project proposes to continue to ensure privacy and safety for the surrounding residential neighborhood with comprehensive screening and buffering of the property from surrounding lands. The proposed Project will expand already efficiently located institutional services and facilities that can continue to serve the community.

The proposed PDP Project allows the expansion of a low-impact land use that has to date generated no significant adverse impacts on surrounding lands or land uses. The levels of service provided by local providers and infrastructure, including the improvement of infrastructure associated with the proposed Project, will assure that adequate levels of service are maintained and remain compatible with existing and planned land uses in the vicinity. Also see Sections 2.15: Public Services, 2.16: Transportation and Traffic, and 2.17: Utilities and Service Systems.

Lands to the north south and east of the subject property are developed as or planned for low density residential uses, which are noise sensitive. The adjoining Barbara Sinatra Children's Center and other offices and facilities on the EMC campus may also be viewed as sensitive noise receptors. While Project demolition and construction may have a limited, short-term impact on neighborhood noise levels, the post-construction noise environment will not change significantly from the current conditions. Also see Section 2.13: Noise of this EIR.

The proposed Project also helps the City to meet its goals of ensuring the availability of high quality healthcare facilities and services that promote the health and well-being of the community's residents. Substance abuse and other addiction behaviors have become a national health crisis and the proposed HBFC capital expansion serves to directly address this need. The proposed Project also allows the HBFC to adapt to the changing demographics of the community and region, and its changing mental and emotional health needs.

In summary, the proposed Project will not conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Rather, the proposed Project will result in the updating and modest expansion of existing healthcare facilities, the need for and changing nature of which have been growing over the past decades.

2.11.7 Mitigation Measures

The proposed Project will not result in the division of an existing, established community, nor will it result in a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Nonetheless, to further ensure that impacts associated with the proposed Project are less than significant, the following mitigation measure is recommended.

LU-1 Construction Staging

Construction activities shall be staged at least 100 feet from residential land uses. Construction activities that have the potential to affect safety, privacy, structures or landscaping, are to be minimized to the greatest degree practicable through standard Best Management Practices.

2.11.8 Significance After Mitigation

As noted, the proposed Project will not result in significant adverse land use impacts, and additional measures are recommended herein to further ensure that impacts are less than significant. The proposed Project will enhance the availability and quality of healthcare services provided by the HBFC. Potential land use impacts will be limited and temporary, will occur only during construction and will be of short duration. Impacts associated with land use and land use compatibility will be less than significant.

2.11.9 Cumulative Impacts

As described herein, the majority of the proposed Project involves the continuing buildout of the HBFC campus pursuant to the City General Plan and the EMC Specific Plan. Any cumulative project impacts related to land use would be typical of the land uses in the cumulative study area but the subject PDP Project would not have an adverse long-term or permanent effect on the character of the vicinity. The geographic scope for the analysis of cumulative impacts on land use consists of each project area and the immediate vicinity where adverse land use impacts could occur. There are no potential Project conflicts or inconsistencies with applicable adopted plans, policies or regulations, and the project would not combine with others to result in a substantial cumulative impact.

Given the nature and limited scope and physical extent of the project, demolition and construction will be carried out in stages and their effects will be short-lived. During the operation and maintenance of the improved HBFC facilities, the surrounding land uses will benefit from incremental improvement to Vista Del Sol and the stabilization of currently vacant sand fields. On-campus operations are expected to be quiet and compatible with existing and planned future land uses. In the overall, there will be a less than cumulatively substantial effect on existing and planned land uses generated by this Project.

2.12 Mineral and Energy Resources

2.12.1 Introduction

This section of the EIR describes existing conditions with regard to mineral and energy resources within the HBFC Project planning area and analyzes the potential impacts of the Project on these resources. This analysis was prepared pursuant to Appendix G of the CEQA Guidelines, as amended in January of 2020. A wide range of data and information, ranging from research to regional scale planning and environmental documents, have been used in researching and analyzing the Project and its potential effects. Specifically, this section evaluates the demand for energy resources attributable to the Project during construction and operation, demonstrates whether the current and planned electrical, natural gas, and petroleum-based fuel supplies and distribution systems are adequate to meet the Project's forecasted energy consumption, and determines the impacts based on the Project's use and conservation of energy resources. This section also addresses existing mineral resources in the region and Project vicinity and potential Project-related impacts to them.

2.12.2 Thresholds of Significance

The following analysis criteria and thresholds are based on Appendix G and those derived from Appendix F of State CEQA Guidelines. A project would have a significant impact relating to energy and mineral resources if it would:

Mineral Resources

a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state.

b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan.

Energy

a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation.

b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

2.12.3 Regulatory Framework

Federal

National Energy Policy Act of 2005

The National Energy Policy Act of 2005 sets equipment energy-efficiency standards, seeks to reduce reliance on nonrenewable energy resources, and provides incentives to reduce current demand on these resources. The act provides for incentives for high-efficiency (including electric) vehicles, new and existing homes, commercial buildings, and manufacturers of high-efficiency appliances. Additionally, the act addresses combined heat and power, appliance labeling, research and development, efficiency in federal and public facilities, building energy codes, public housing, and other efficiency topics.

State

Surface Mining and Reclamation Act of 1975

The State Mining and Reclamation Act (SMARA) was enacted in 1975 in response to land use conflicts between urban growth and essential mineral production. In accordance with SMARA and as discussed below, the State has established the Mineral Land Classification System to help identify and protect mineral resources in areas that are subject to urban expansion or other irreversible land uses that would preclude mineral extraction. Protected mineral resources include construction materials, industrial and chemical mineral materials, metallic and rare minerals, and non-fluid mineral fuels.

California 2008 Energy Action Plan Update

The 2008 update to the 2005 Energy Action Plan II is the State's principal energy planning and policy document. The updated document examines the State's ongoing actions in the context of global climate change. The Energy Action Plan II continues the goals of the original 2003 Energy Action Plan, describes a coordinated implementation plan for state energy policies, and identifies specific action areas to ensure that California's energy resources are adequate, affordable, technologically advanced, and environmentally sound. In accordance with this plan, the first-priority actions to address California's increasing energy demands are energy efficiency and demand response (i.e., reduction of customer energy usage during peak periods to address system reliability and support the best use of energy infrastructure). Additional priorities include the use of renewable sources of power and distributed generation (i.e., the use of relatively small power plants near or at centers of high demand). To the extent that these actions are unable to satisfy the increasing energy demand and transmission capacity needs, clean and efficient fossil-fired generation is supported.

The California 2008 Energy Action Plan Update examines policy changes in the areas of energy efficiency, demand response, renewable energy, electricity reliability and infrastructure, electricity market structure, natural gas supply and infrastructure, research and development, and climate change.

Assembly Bill 32 (2006) and Senate Bill 32 (2016)

In 2006, the Legislature enacted AB 32, the California Global Warming Solutions Act of 2006. AB 32 requires California to reduce its GHG emissions to 1990 levels by 2020. In 2016, the Legislature enacted SB 32, which extended the horizon year of the state's codified GHG reduction planning targets from 2020 to 2030, requiring California to reduce its GHG emissions to 40% below 1990 levels by 2030. In accordance with AB 32 and SB 32, the California Air Resources Board (CARB) prepares scoping plans to guide the development of statewide policies and regulations for the reduction of GHG emissions. Many of the policy and regulatory concepts identified in the scoping plans focus on increasing energy efficiencies and the use of renewable resources and reducing the consumption of petroleum-based fuels (such as gasoline and diesel). As such, the State's GHG emissions reduction planning framework creates co-benefits for energy-related resources. Additional information on AB 32 and SB 32 is provided in Section 2.8, Greenhouse Gas Emissions, of this EIR.

California Building Standards

Part 6 of Title 24 of the California Code of Regulations was established in 1978 and serves to enhance and regulate California's building standards. Part 6 establishes energy efficiency standards for residential and non-residential buildings constructed in California to reduce energy demand and consumption. Part 6 is updated periodically to incorporate and consider new energy efficiency technologies and methodologies.

The 2016 Title 24 building energy efficiency standards, which became effective on January 1, 2017, further reduce energy used in the State. In general, single-family homes built to the 2016 standards are anticipated to use approximately 28% less energy for lighting, heating, cooling, ventilation, and water heating than those built to the 2013 standards, and non-residential buildings built to the 2016 standards will use an estimated 5% less energy than those built to the 2013 standards (CEC 2015c).

Title 24 also includes Part 11, the California Green Building Standards (CALGreen). The CALGreen standards took effect in January 2011 and instituted mandatory minimum environmental performance standards for all ground-up, new construction of commercial, low-rise residential, and State-owned buildings, as well as schools and hospitals. The 2016 CALGreen standards became effective on January 1, 2017. The mandatory standards require the following:

- 20% mandatory reduction in indoor water use
- 50% diversion of construction and demolition waste from landfills
- Mandatory inspections of energy systems to ensure optimal working efficiency

Integrated Energy Policy Report

The California Energy Commission (CEC) is responsible for preparing integrated energy policy reports, which identify emerging trends related to energy supply, demand, conservation, public health and safety, and maintenance of a healthy economy. The CEC's 2015 Integrated Energy Policy Report discusses the State's policy goal to require that new residential construction be designed to achieve zero net energy (ZNE) standards by 2020 and that new non-residential construction be designed to achieve ZNE standards by 2030.

Regional and Local

County of Riverside Climate Action Plan

Riverside County has adopted a climate action plan that quantifies the current level of GHG emissions in its jurisdiction and provides the approach and programs that will be pursued to reduce GHG emission in the long-term.[1] The plan provides more stringent energy reduction requirements than those currently in effect.

Rancho Mirage Sustainability Plan

The City of Rancho Mirage completed the 2013 Sustainability Action Plan: Leadership in Energy Efficiency (Sustainability Plan) in March 2013. The Sustainability Plan is a framework for the development and implementation of policies and programs that will reduce the City's emissions, working towards the Statewide target of 1990 levels by 2020, set by AB 32. The Plan suggests a number of energy efficiency and other resource conservation measures with benefit and cost information, and the most relevant measures applicable to the proposed Project can be found in the "Where We Live (LIVE)", "Where We Work (WORK)", and "How We Build (BUILD)" spheres among the seven spheres defined for addressing major emission sources in daily life.

Rancho Mirage 2017 General Plan Update

The Conservation and Open Space (COS) Element of the 2017 Rancho Mirage General Plan defines and establishes goals, policies and programs toward preserving and managing valuable resources in the city. It addresses the need for conservation, diverse development, and thoughtful use and management of energy and mineral resources. The COS Element includes the following policies pertaining to energy and mineral resources:

Goal COS 4 The conservation, efficient use, and thoughtful management of energy sources and mineral deposits.

Policy COS 5.1 The City shall promote energy efficiency and conservation in all areas of community development, including transportation, development planning, and public and private sector construction and operation, as well as in the full range of residential and nonresidential projects.

[1] County of Riverside Climate Action Plan, 2015.

2.12.4 Environmental Setting

The Coachella Valley region is important in terms of both construction-related mineral resources and the production of energy from renewable resources. Mineral resources are largely associated with fluvial deposits in the Indio Hills, Mecca Hills and foothills of the Little San Bernardino Mountains. Energy resources are becoming more distributed in the valley, with wind turbine development focused in the San Gorgonio Pass area and geothermal at the south end of the Salton Sea. Solar photovoltaic systems are being developed throughout the valley.

Mineral Resources
In the Coachella Valley, mineral resources are largely limited to aggregates, such as sand, gravel, and crushed stone. These are major components of concrete, plaster, stucco, road base and fill, which are essential to the construction industry. There are important deposits of these materials that occur within the region that are being actively developed.

Other mineral deposits in the region are generally limited to rocky outcroppings within the Little San Bernardino and Santa Rosa Mountains and have not been mined. These resources include copper, limestone, specialty sands, and tungsten. There are decorative stone deposits that are being mined on public land in the Painted Hills area west of Desert Hot Springs, as well as clay deposits at the base of the Mecca Hills east of Thermal on public and private land. These may be used as an impermeable layer for lining landfills, ponds, and similar construction applications, and some of these deposits have been permitted for mining.

The California Geological Survey collects and analyzes information about the State's mineral resources. As set forth in Section 2761(b) of SMARA, the State Geologist classifies land for mineral resources solely on the basis of geologic factors, regardless of existing land use and land ownership. Mineral land classifications for Portland cement concrete (PCC)-grade aggregate materials in the Coachella Valley were mapped by the State Geological Survey in 1988 (Special Report 159)[2] and updated in 2007 (Special Report 198).[3] Areas subject to mineral land classification studies are divided by the State Geologist into Mineral Resource Zone (MRZ) categories that reflect varying degrees of mineral resource potential. The MRZ categories are briefly described below.

MRZ-1: Areas where available geologic information indicates that little likelihood exists for the presence of significant mineral resources.

MRZ-2 (used in Special Report 159): Areas where adequate information indicates that significant mineral deposits are present, or where it is judged that a high likelihood for their presence exists. This zone shall be applied to known mineral deposits or where well-developed lines of reasoning, based upon economic-geologic principles and adequate data, demonstrate that the likelihood for the occurrence of significant mineral deposits is high.

MRZ-2a: Areas underlain by mineral deposits where geologic data indicate that significant *measured or indicated* resources are present. Contains known economic mineral deposits.

MRZ-2b: Areas underlain by mineral deposits where geologic information indicates that significant *inferred* resources are present.

MRZ-3: Areas containing *known* or inferred mineral occurrences of undetermined mineral resource significance.

[2] Mineral Land Classifications: Aggregate Materials in the Palm Springs Production-Consumption Region, Riverside County, California, Special Report 159 (SR 159), California Department of Conservation, 1988.

[3] Update of Mineral Land Classifications for Portland Cement Concrete-grade Aggregate in the Palm Springs Production-Consumption Region, Riverside County, California, Special Report 198 (SR 198), California Department of Conservation, 2007.

In the Coachella Valley, MRZ-1 areas are generally located in the Rancho Mirage, Palm Desert, Indio, Coachella, and Thermal areas. MRZ-2 areas are generally located in the northwestern portion of Palm Springs and North Indio Hills. The majority of the Palm Springs, Cathedral City, Thousand Palms, Desert Hot Springs, Indian Wells, and La Quinta area are designated MRZ-3. All areas within Rancho Mirage south of Interstate 10 are within MRZ-1 and MRZ-3.[4]

Energy Resources

Primary energy sources include nuclear energy, fossil energy (oil, coal and natural gas), and renewable sources such as wind, solar, geothermal, and hydropower. These primary sources are converted to electricity, a secondary energy source, which flows through power lines and other transmission infrastructure to end users.

Electricity

Electricity, a consumptive utility, is a man-made resource. The delivery of electricity involves a number of system components, including substations and transformers that decrease transmission line power (voltage) to a level appropriate for on-site distribution and use. Conveyance of electricity through transmission lines is typically responsive to demand. The production of electricity requires the consumption or conversion of energy resources (e.g., water, wind, oil, gas, coal, solar, geothermal, and nuclear resources) into electric energy. In California, the main sources of electrical energy are natural gas (41.5%), coal (15.7%) and nuclear (12.9%) and large-scale hydro (19.0%). Renewables make up 10.9% of all sources of electric power.[5]

Energy capacity, or electrical power, is generally measured in watts, while energy use is measured in watt-hours. Residential, commercial, and industrial sectors are the three main consumers of electricity. According to the California Energy Commission (CEC), statewide electricity consumption in 2019 is projected to be approximately 320,000 GWh which will increase to 333,838 GWh in 2022.[6] The Statewide Electricity Annual Consumption per capita is also projected to grow from 7,700 kWh in 2019 to 7,900 kWh in 2022.[7] The average annual electricity demand growth in California from 2012 to 2024 is expected to range from 0.88 to 1.82 percent, while peak annual electricity demand growth is expected to range from 0.97 to 1.92 percent.[8]

Natural Gas

Natural gas is a combustible mixture of simple hydrocarbon compounds (primarily methane) that is used as a fuel source. Natural gas consumed in California is obtained from naturally occurring reservoirs, mainly located outside the State and delivered through high-pressure transmission pipelines. The natural gas transportation system is a nationwide network, and therefore, resource availability is typically not an issue. Natural gas satisfies almost one-third of the State's total energy requirements and is used in electricity generation, space heating, cooking, water heating, industrial processes, and as a transportation fuel. Natural gas is measured in terms of cubic feet. According to the CEC, statewide natural gas consumption in 2019 is projected to be approximately 13,500 MM therms, which will increase to 13,929 MM therms in 2022.[9] The Statewide natural gas annual consumption per capita is projected to decline from 340 therms in 2019 to 330 therms in 2022.[10]

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4 Update of Mineral Land Classification Map for Portland Cement Concrete-Grade Aggregate in the Palm Springs Production-Consumption (P-C) Region, Riverside County, California, Special Report 198 – Plate 1, California Department of Conservation, 2007.

5 California State Auditor Report 2007-119, January 2018.

6 California Energy Demand 2012-2022 Final Forecast by California Energy Commission – Table 1-1 (Final Forecasts of Statewide Electricity Demand).

7 California Energy Demand 2012-2022 Final Forecast by California Energy Commission – Figure 1-2 (Final Forecasts of Statewide Electricity Demand).

8 2013 Integrated Energy Policy Report, California Energy Commission.

9 California Energy Demand 2012-2022 Final Forecast – Table 1-1 (Final Forecasts of Statewide Natural Gas Demand), California Energy Commission.

10 California Energy Demand 2012-2022 Final Forecast – Figure 1-2 (Final Forecasts of Statewide Natural Gas Demand), California Energy Commission.

Wind Energy

The Coachella Valley region has seen major developments in wind energy; the region is known internationally for the scale of wind resource development. The western Coachella Valley is a proven wind resource area, where strong and sustained winds are channeled through the San Gorgonio Pass and into the valley. Today, the San Gorgonio Pass is home to one of the nation's largest wind farms; it includes more than 2,299 wind turbines, with a total capacity of 665 megawatts.[11]

Solar Energy

The Coachella Valley region is a growing source of electricity generated by solar photovoltaic systems being developed on residential rooftops, commercial and industrial buildings, institutional uses, and covered parking structures.

Geothermal Energy

Geothermal energy is produced by the heat of the earth and is often associated with volcanic or seismically active regions. The State of California has 25 Known Geothermal Resource Areas (KGRAs), fourteen (14) of which have temperatures of 300 degrees Fahrenheit or greater.[12] Approximately 11,528 gigawatt-hours (GWh) of electricity was produced from geothermal sources in California in 2018.[13]

The northwestern portion of the Coachella Valley contains limited geothermal resources, including hot springs in Palm Springs and Desert Hot Springs. These hot water areas result from faults and are primarily focused along the Mission Creek fault but also along the Palm Canyon fault. The geothermal energy produced in Palm Springs and Desert Hot Springs is generally used for commercial spas and therapeutic pools. These resources are limited, located on private lands, and not used for energy production. Geothermal energy on a utility scale has been found and developed at the south end of the Salton Sea in Imperial County, where more than 1,170.46 megawatts of geothermal electric power have been developed.[14]

Transportation Energy

According to the CEC, transportation accounts for nearly 40% of California's total energy consumption and approximately 39% of the State's greenhouse gas emissions.[15] In 2015, California consumed 23.2 billion gallons of petroleum, including 15.5 billion gallons of finished gasoline and 3.7 billion gallons of diesel.[16] The State is now working on developing flexible strategies to reduce petroleum consumption. Over the last decade, California has implemented several policies, rules, and regulations to improve vehicle efficiency, increase the development and use of alternative fuels, reduce air pollutants and GHGs from the transportation sector, and reduce vehicle miles traveled (VMT). Accordingly, gasoline consumption in California has declined. The CEC predicts that the demand for gasoline will continue to decline over the next ten years and there will be an increase in the use of alternative fuels, such as natural gas, biofuels, and electricity.

According to the CEC, current statewide gasoline consumption is approximately 15.2 billion gallons which is projected to decrease to 12.6 billion gallons in 2030.[17] The current statewide diesel consumption is approximately 4.1 billion gallons which is also projected to decrease to 3.85 billion gallons in 2030.[18]

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11 United States Wind Turbine Database, USGS Energy Resources, July 2018, https://eerscmap.usgs.gov/uswtdb/viewer/#14.75/33.88239/-116.46539, accessed April 2019.

12 California Geothermal Energy Statistics & Data, California Energy Commission website, https://www.energy.ca.gov/almanac/renewables_data/geothermal/, accessed April 2019.

13 Ibid.

14 Ibid.

15 p. 21, Integrated Energy Policy Report (IEPR) 2013, California Energy Commission.

16 p. 35, Revised Transportation Energy Demand Forecast, 2018-2030, California Energy Commission, February 2018.

17 California Energy Demand 2012-2022 Final Forecast - Table 1-1 (Final Forecasts of Statewide Electricity Demand), California Energy Commission.

18 pages 74-76, Revised Transportation Energy Demand Forecast, 2018-2030, California Energy Commission, February 2018.

2.12.5 Existing Conditions

Mineral Resources

The mountains and foothills surrounding the Coachella Valley have a history of mining that dates back to the late 1800s. Mines in the Santa Rosa and San Jacinto National Monument have produced gold, asbestos, beryllium, limestone, tungsten, copper, tourmaline, and garnet. With the exception of limestone, however, these mineral deposits have not been extensively mined, are limited, or are not precisely known.

The surrounding mountain ranges and eroding hills have filled the valley with deep and extensive deposits of sand and gravel, known collectively as aggregate. Aggregate is used for asphalt, concrete, road base, stucco, plaster, and other similar construction materials. The Palm Springs Production-Consumption (P-C) Region is a 631 square mile area in the Coachella Valley that is heavily mined for aggregate. [19, 20] This region covers the area east of Cabazon, south of Morongo Valley and Joshua Tree National Park, west of the Mecca Hills, and north of the community of Mecca and the San Jacinto Mountains. According to California Geological Survey, the Palm Springs P-C Region contains 3.2± billion tons of aggregate resources.[21] The Coachella Valley has eleven permitted aggregate operations, which contain approximately 167 million tons of permitted resources (reserves).[22]

According to California Geological Survey Special Report 198, the average local annual per capita consumption rate for aggregate in the Palm Springs Production-Consumption Region is 9.6 tons.[23] While the Coachella Valley has an abundant, high-quality local supply of PCC-grade aggregate, a desirable commodity for development markets, transportation costs are a major component affecting cost competitiveness. Given the widespread deposition of aggregate materials in southern California, demand for local resources is expected to remain largely local. The reserves are expected to meet local demand and provide adequate supply at current rates of consumption through the year 2038.

The Project site is located within MRZ-1, where available information indicates that little likelihood exists for the presence of significant mineral resources.[24] In addition, the Project site is partially developed and is surrounded by existing urban development, making it unsuitable for mineral extraction operations.

Energy Resources

Electricity

The Project site is located within the Southern California Edison (SCE) service area which covers approximately 50,000 square miles. Currently, SCE serves approximately 4.4 million residential service accounts and 520,000 commercial service accounts which use up to 69 percent of total electricity in SCE's service area.[25] SCE is mandated to include alternative energy sources to reduce energy consumption. For the residential sector, SCE's goal is to save

19 Update of Mineral Land Classification Map for Portland Cement Concrete-Grade Aggregate in the Palm Springs Production-Consumption (P-C) Region, Riverside County, California, Special Report 198, California Department of Conservation, 2007.

20 The Palm Springs Production-Consumption Region generally extends from Cabazon on the west to Mecca on the east.

21 Mineral Land Classifications: Aggregate Materials in the Palm Springs Production-Consumption Region, Riverside County, California, Special Report 159 (SR 159), California Department of Conservation, 1988.

22 Update of Mineral Land Classification Map for Portland Cement Concrete-Grade Aggregate in the Palm Springs Production-Consumption (P-C) Region, Riverside County, California, Special Report 198, California Department of Conservation, 2007.

23 Ibid.

24 Ibid.

25 pages 42 and 43, Errata to Southern California Edison Company's Amended Energy Efficiency Rolling Portfolio Business Plan For 2018-2025, SCE, May 15, 2017.

approximately 272,779,591 kWh and 300,875,517 in 2020 and 2025, respectively. For the commercial sector, SCE's goal is to save approximately 284,192,845 kWh and 313,464,319 kWh in 2020 and 2025, respectively.[26]

The Rancho Mirage Energy Authority (RMEA), a locally run, not-for-profit power program was created by the City and started providing power on May 1, 2018. RMEA is overseen by the Rancho Mirage City Council to provide clean power exclusively to residents and businesses that are currently served by SCE within the City. RMEA purchases power directly from power providers, pays consultants for compliance functions, and sets electricity rates based on overall costs. The RMEA power mix is cleaner and cheaper than SCE power, though still delivered through SCE facilities. SCE remains the utility provider and continues to bill and collect from customers but using RMEA's lower electricity rates, which saves the residents and businesses 5% compared to SCE rates. All customers were automatically signed up for the 5% savings on May 1, 2018 and have the options to upgrade to Premium Renewable Choice or Solar Choice or opt out of RMEA.

The CEC estimated that the total electricity consumption for Riverside County was 15,980.73 million kWh in 2018.[27] According to the Rancho Mirage Community Choice Aggregation Implementation Plan, city-wide electricity demand in Rancho Mirage in 2018 was projected at 214,120,000 kWh.[28] This includes all electricity consumed by municipal buildings, residential, commercial, and industrial land uses, and resorts and golf courses, combined. The actual consumption data is not currently available; however, it can be assumed that current electricity usage per capita is close to the projection, if not less, due to the increased energy efficiency standards of the California Building and Energy Codes.

Currently, SCE distribution lines are located in proximity to Project site, bordering the EMC campus along MacMillan Way and Vista Del Sol toward Country Club Drive. There is also a sub-transmission circuit (115.0 kV) running south along Bob Hope Drive, then eastbound on Frank Sinatra Drive and southbound parallel to Vista Del Sol through the eastern undeveloped portion of the Project site. The current electricity demand of the Hazelden Betty Ford Center is adequately serviced by SCE; projected Project-related consumption at build out is discussed in Section 2.12.6, Project Impacts.

Natural Gas

Natural gas is provided to the City of Rancho Mirage by the Southern California Gas Company (SoCalGas). The service territory of SoCalGas encompasses approximately 24,000 square miles in diverse terrain throughout central and southern California, from the City of Visalia to the Mexican border.[29] SoCalGas receives gas supplies from several sedimentary basins in the western United States and Canada, as well as local California supplies.[30]

Natural gas for SoCalGas is delivered to the region through interstate pipelines. Natural gas supplies are transported from Texas to the Coachella Valley through three east-west trending gas lines, which cross the Valley near and parallel to Interstate-10 and continue west to Los Angeles. In the Project area, existing underground high-pressure distribution lines are located along Frank Sinatra Drive westbound to Vista Del Sol, then southbound to and along MacMillan Way bordering the EMC campus north of the Project site. Onsite gas lines are to be protected in place, extending along the north and west sides of the Dupont Hall (to be demolished) and further east from along the north side of the existing pool (to remain).

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26 Errata to Southern California Edison Company's Amended Energy Efficiency Rolling Portfolio Business Plan For 2018-2025, SCE, May 15, 2017.

27 Total electricity consumption for 2018, California Energy Consumption Database for Riverside County, California Energy Commission.

28 Rancho Mirage Community Choice Aggregation Implementation Plan, October 2017.

29 Company Profile, SoCalGas website, https://www.socalgas.com/about-us/company-profile, accessed December 2019.

30 2014 California Gas Report, SoCalGas website, https://www.socalgas.com/regulatory/documents/cgr/2014-cgr.pdf, accessed December 2019.

According to the Rancho Mirage Energy Action Plan, city-wide natural gas consumption totaled 10,593,308 therms in 2010.[31] This includes natural gas consumed by residential, commercial, and industrial land uses, and resorts and golf courses. The report has not been updated, and a more recent estimate is not currently available. However, similar to statewide predictions, it can be assumed that the annual consumption of natural gas per capita within the City of Rancho Mirage will be comparable to 2010 or even decline like the statewide trend since the late 1990s. Currently, the natural gas demand of the Hazelden Betty Ford Center is adequately serviced by SoCalGas; projected Project-related demand at build out is discussed in Section 2.12.6, Project Impacts.

Transportation Energy

Most energy for transportation is provided by petroleum in the form of gasoline and diesel fuel. Petroleum accounts for more than 90 percent of California's transportation energy sources.[32] Alternative fuels such as ethanol, natural gas, biodiesel, hydrogen, and electricity are also used for transportation. While the proposed improvements at the HBFC may result in an increase in VMTs compared to current conditions, there is an ongoing trend that higher fuel efficiency technologies and standards result in less fuel consumption for the same or even higher VMTs. In addition, proposed road improvements and new direct access to the HBFC via Vista Del Sol could potentially reduce VMTs associated with the current access routes (see Section 2.16, Transportation and Traffic, for more analysis of VMTs).

2.12.6 Project Impacts

Mineral Resources

Would the Project:

a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

Less Than Significant Impact. The Project would result in construction of new buildings and paved surfaces, including driveways and sidewalks, which will increase the demand for aggregate resources. Some of these resources could be derived from the regional Coachella Valley market, which are a valuable regional commodity. However, Project demand would not be considered significant when compared to available regional resources. As described above, PCC-grade aggregate reserves in the Palm Springs Production-Consumption Region are projected to be enough to meet future demand in the region through at least the year 2038. Some aggregate resources used in Project construction may be acquired from recycled aggregate or regions outside the Coachella Valley, thereby reducing the consumption of local supplies. Therefore, the potential loss of availability of these local resources resulting from the Project would be less than significant.

b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

No Impact. The Project is located within MRZ-1. MRZ-1 is a Mineral Resource Zone in which no significant mineral deposits are present or likely to be present. Moreover, the Project site is partially developed and is surrounded by existing urban development, making it unsuitable for mineral extraction operations. The proposed Project would result in no impact to a locally important mineral resource recovery site.

[31] Rancho Mirage Energy Action Plan 2013.
[32] "California Fuel Facts," Western States Petroleum Association (WSPA), April 2017.

Energy

Would the Project:

a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Less Than Significant Impact. During Project construction, energy would be consumed in three general forms: (1) petroleum-based fuels used to power off-road construction vehicles and equipment on the project site, construction worker travel to and from the project site, and delivery and haul truck trips (e.g. hauling of demolition material to off-site reuse and disposal facilities); (2) electricity associated with the conveyance of water that would be used during Project construction for dust control (supply and conveyance) and electricity to power any necessary lighting during construction, electronic equipment, or other construction activities necessitating electrical power; and (3) energy used in the production of construction materials, such as asphalt, steel, concrete, pipes, and manufactured or processed materials such as lumber and glass.

Electricity: During construction, electricity would be consumed to demolish four residential buildings and construct two new ones, a new day-treatment building, and a primary access road, as well as ancillary site modifications. To the greatest extent feasible, new service installations and connections would be scheduled and implemented in a manner that would not result in electrical service interruptions to other properties. Compliance with SCE's guidelines and requirements would ensure that the Project applicant fulfills its responsibilities by coordinating any electrical infrastructure installation and extension with SCE and limits any impacts associated with grading, construction, and development within SCE easements. Extension of the electric lines and construction of the Project is not anticipated to adversely affect the electrical infrastructure serving surrounding properties or the utility system capacity.

Electricity consumed during Project construction would vary throughout the construction period based on the construction activities being performed. Activities requiring electricity may include powering outdoor security or worksite lighting, operation and charging of electronic equipment, and powering a temporary worksite office or trailer. Such electricity demand would be temporary, nominal, and would cease upon the completion of construction. Electricity may also be used to incrementally power Project improvements as they are built out, which is further discussed under "Operational Energy Demands," below.

Overall, electricity will not be the primary energy source used during construction. Instead, the use of equipment fuels, such as diesel and petroleum, will be the primary energy source. Less than significant impacts are anticipated. (See "Transportation Energy" for analysis of transportation energy demands during construction.)

Natural Gas: Construction of the three new buildings, a primary access road, and ancillary site modifications typically would not involve the consumption of natural gas. Construction may, however, involve installation of new natural gas connections to serve the Project site. Construction impacts associated with the installation of natural gas connections are expected to be confined to trenching in order to place the lines below ground. Prior to ground disturbance, Project contractors would notify and coordinate with SoCalGas to identify the locations and depths of all existing gas lines and avoid disruption of gas service. The use of natural gas during Project construction would not be wasteful, inefficient, or unnecessary. Construction-related impacts to natural gas supplies and infrastructure would be less than significant.

Transportation Energy: Fuels consumed by construction equipment, such as petroleum and diesel, would be the primary energy resource expended over the course of construction, and vehicle miles traveled (VMT) associated with the transportation of construction materials and construction worker commutes would also result in petroleum consumption. Heavy-duty construction equipment associated with construction activities, as well as haul trucks involved in moving dirt around the Project area, would rely on diesel fuel. Construction workers would travel to

and from the Project area throughout the duration of construction. It is assumed that construction workers would travel to and from the Project area in gasoline-powered vehicles. It is expected that most construction workers will live locally, which would minimize the need for long commutes and limit fuel consumption.

According to the CalEEMod outputs in Appendix B generated for air quality analysis, it is assumed that worker trip lengths are 11 miles, vendor trip lengths are 5.4 miles, and hauling trip lengths are 20 miles. Because it is assumed that most construction workers will live locally, it is reasonable to assume that these VMTs have already been accounted for in the community-wide VMT assumptions for worker commutes, insofar as these workers currently commute to other job sites, and do not constitute a new source of VMTs. Long-term operation of the Project will, however, result in additional VMTs, which are further discussed below under "Operational Energy Demands."

Overall, petroleum and diesel use during construction would be temporary and minimal and would not be wasteful or inefficient. Construction-related transportation energy impacts would be less than significant.

Operational Energy Demands

During operation of the Project, energy would be consumed for multiple purposes including, but not limited to, lighting, heating/ventilating/air conditioning (HVAC), refrigeration, electronics, office equipment, residential and medical machinery (including kitchen appliances), and swimming pool operations. Energy would also be consumed for vehicle trips. The Project proposes demolition of four residential buildings and construction of two new ones, a new day-treatment building, and a primary access road, as well as ancillary site modifications; therefore, net change in energy demand would mainly come from the difference in demands of three new buildings and the four to be demolished, plus the change in VMTs due to improved facility and treatment capacity and new direct access resulting from the new access road connecting HBFC to Vista Del Sol.

Electricity: Adherence to current California Building Code and Energy Code standards will ensure the most energy efficient technologies and practices are used for the development and operation of the Project. Current annual electricity consumption at the Betty Ford Center is approximately 3,609,651 kWh, equivalent to 26.31 kWh per square foot building area.[33] According to the CalEEMod outputs for the proposed Project, the electricity consumption rate for new buildings is approximately 15.83 kWh per square foot, which is a 10.48 kWh rate decrease due to increased energy efficiency standards for new construction. Therefore, by applying 26.31 kWh/sq.ft. to the building area that will remain, and 15.83 kWh/sq.ft. to the proposed new building area, the Project would consume an additional 521,146 kWh per year at build out, representing less than 0.3 percent increase in annual City-wide kWh usage. The proposed buildings will be designed ready for the installation of solar photovoltaic panels, which could further offset the Project's electricity demand in the future. The Project will not result in wasteful, inefficient, or unnecessary consumption of electrical energy resources during operation. Impacts would be less than significant.

Natural Gas: Operation of the proposed Project would consume natural gas for heating, cooking, and domestic hot water. Current annual natural gas consumption at the Betty Ford Center is approximately 70,968 therms, equivalent to 0.52 therms per building square footage.[34] Applying 0.52 therms/sq. ft. to the proposed building area, the Project would consume an additional 17,030 therms per year of natural gas at build out, which is less than 0.2 percent increase in annual City-wide usage. As previously discussed, adherence to current California Building Code and Energy Code standards will ensure the most energy efficient technologies and practices are used for the development and operation of the Project. The Project will not result in wasteful, inefficient, or unnecessary consumption of natural gas energy resources during project operation. Impacts would be less than significant.

33 SCE electricity statements for the Betty Ford Center, December 2018 through January 2020.
34 SoCalGas natural gas statements for the Betty Ford Center, December 2018 through January 2020.

Transportation Energy: During operation, the Project would result in an additional 1,453,970 vehicle miles traveled to and from the Project site[35], resulting in the consumption of petroleum-based fuels related to vehicular travel. Employees and visitors will include a mix of local residents and out-of-town visitors. It should be noted that VMTs are regional in nature, and that not all Project VMTs will occur solely within the City's boundaries.

The EPA and CARB set forth up-to-date vehicle fuel efficiency standards to reduce vehicle emissions. Increased fuel efficiency means less fuel energy consumed per mile traveled. Although the Project will increase VMTs, it will not interfere with increased fuel efficiency standards and will not result in wasteful, inefficient, or unnecessary consumption of transportation energy resources during operation. Impacts would be less than significant.

b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

No Impact. The proposed Project would comply with all applicable regulations pertaining to renewable energy and energy efficiency in its design, construction, and operation. The Project would follow the 2016 California Green Building Code and 2019 Energy Code to ensure the most efficient construction/building technologies are used to benefit overall building operations in the long term. The proposed buildings are designed to be solar-ready to accommodate installation of solar panels in the future. The Project will not interfere with any state or local plan that promotes renewable energy or energy efficiency. Adherence to the applicable State standards enforced by the City will ensure the project is consistent with current energy standards and conservation goals. Therefore, no impact related to compliance with energy-related plans would occur.

2.12.7 Mitigation Measures

Given the Project's less than significant impacts, no mitigation measures are required.

2.12.8 Significance After Mitigation

Project-level energy impacts would be less than significant.

2.12.9 Cumulative Impacts

Potential cumulative impacts on energy would result if the proposed Project, in combination with past, present, and future projects, would result in the wasteful or inefficient use of energy. This could result from development that would not incorporate sufficient building energy efficiency features or achieve building energy efficiency standards, or that would result in unnecessary use of energy during construction and/or operation. Projects within the areas served by the energy service providers would be applicable to this analysis. Projects that include development of large buildings or other structures that would have the potential to consume energy in an inefficient manner would have the potential to contribute to a cumulative impact. Projects that involve major construction, such as transportation infrastructure, could also contribute to a cumulative impact; however, the impact of these projects would be limited because they would typically not involve substantial ongoing energy use.

As described previously, the proposed Project would result in a decrease in the consumption of electricity, but increase in natural gas and transportation-related energy; however, it would not result in wasteful, inefficient, or unnecessary use of energy due to design features, including design to accommodate a balanced mix of uses internal to the proposed Project, installation of energy-efficient appliances and efficient water fixtures, and potential offset of electrical energy usage through the installation of PV solar panels in the future. Similar to the proposed Project, future projects would be subject to CALGreen, an evolving set of energy efficiency standards for commercial and residential buildings implemented to minimize the wasteful and inefficient use of energy. In addition to CALGreen's increasingly stringent standards, projects would be required to meet or exceed the Title 24 building standards, further cutting the inefficient use of energy.

[35] CalEEMod outputs and Project-specific data (see Appendix B).

Future development would be subject to even more stringent requirements, such as the objectives set in the AB 32 Scoping Plan (CARB 2017) that would seek to make all new residential homes zero net energy (ZNE) consumers by 2020[36], and all new commercial buildings zero net energy (ZNE) consumers by 2030.[37] Furthermore, many federal, state, and local regulations would aim to reduce the transportation fuel demand of cumulative projects and thus reduce cumulative energy demand of the projects. Therefore, cumulative impacts related to energy resources are considered less than significant.

[36] New Residential Zero Net Energy Action Plan 2015-2020 – Executive Summary, California Public Utilities Commission Energy Division and California Energy Commission Efficiency Division.

[37] Zero Net Energy, California Public Utilities Commission Energy Division; http://www.cpuc.ca.gov/ZNE/, accessed December 2019.

2.13 Noise

2.13.1 Introduction

This section of the EIR describes existing noise conditions in the Project area, analyzes potential Project-related noise impacts and, where necessary, provides mitigation measures that are effective in reducing impacts. It is based on a wide range of information, including the Project-specific Noise Impact Analysis prepared by Urban Crossroads[1] in February 2020 (see Appendix G).

2.13.2 Thresholds of Significance

According to Appendix G of the CEQA Guidelines, Project-related noise impacts would be considered significant if the Project would result in:

a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies;

b) Generation of excessive groundborne vibration or groundborne noise levels;

c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels.

2.13.3 Regulatory Framework

Federal

There are no federal regulations that apply to the proposed Project.

State

California Noise Control Act

California Health and Safety Code Section 46000 is known as the California Noise Control Act. Section 46050(g) tasks the State with developing criteria and guidelines for use in setting standards for human exposure to noise. The guidelines recommend acceptable exterior noise levels for various land uses. An exterior noise level of 70 dBA Ldn/CNEL is typically the dividing line between an acceptable and unacceptable exterior noise environment for all noise-sensitive uses, including schools, libraries, churches, hospitals, day care centers, and nursing homes of conventional construction. Noise levels below 75 dBA Ldn/CNEL are typically acceptable for office and commercial buildings, while levels up to 80 dBA Ldn/CNEL are typically acceptable for industrial uses.

The State's "General Plan Guidelines" (2017), prepared by the Governor's Office of Planning and Research (OPR), includes a noise level/land use compatibility matrix that is based on the above-referenced guidelines.[2] It is intended to help municipalities gauge the compatibility of land uses relative to exterior noise levels.

[1] "Hazelden Betty Ford Center Noise Impact Analysis City of Rancho Mirage" , prepared by Urban Crossroads, Inc., February 9, 2020

[2] Figure 2, Appendix D: Noise Element Guidelines, State of California General Plan Guidelines, Governor's Office of Planning and Research.

California Government Code

Section 65302(f)(1) of the California Government Code requires that each jurisdiction recognize the State noise guidelines while preparing its general plan; however, the California Government Code does not mandate application of the compatibility matrix to development projects.

Regional and Local

Rancho Mirage General Plan

The Rancho Mirage General Plan Noise Element includes the above-described land use compatibility matrix, and the City uses it as a guide for planning compatible land uses.

The General Plan Noise Element also sets forth goals, policies, and programs to minimize noise impacts and protect sensitive land uses from exposure to excessive noise levels. Those that are relevant to the Project include the following:

Goal N 1	A noise environment providing peace and quiet that complements and is consistent with Rancho Mirage's resort residential character.
Policy N 1.1	Land use patterns, associated traffic and its distribution, and individual developments shall be assessed for their potential to generate adverse and incompatible noise impacts. Noise exceeding normally acceptable levels shall be appropriated mitigated.
Policy N 1.2	Noise sensitive land uses, including residences, resorts, community open space, schools, libraries, churches, hospitals, and convalescent homes, shall be protected from high noise levels emitted by both existing and future noise sources.
Program N 1.2A	On a project-specific basis, apply noise mitigating site planning and require the installation of sound walls, earthen berms, wall and window noise insulation, and/or other mitigation measures in areas exceeding the City's normally acceptable noise limits.
Policy N 1.3	Project designs shall be required to include measures that assure that interior noise levels for residential development do not exceed 45 dBA CNEL.

Rancho Mirage Municipal Code

Noise Standards

Rancho Mirage Municipal Code Section 17.18.060 states that all "uses, activities, and processes shall not generate or emit any noise or sound beyond the property line of the subject parcel, which exceeds the maximum level identified in the Municipal Code Chapter 8.45 (Noise)." Chapter 8.45 (Noise Ordinance) establishes exterior noise level limits (dBA) for land use zones throughout the City. Table 2.13-1, below, describes exterior noise level limits for a cumulative period of more than 30 minutes in any hour of the applicable time period, as set forth in the Noise Ordinance.

Table 2.13-1
Rancho Mirage Exterior Noise Level Limits

For a cumulative period of more than 30 minutes in any hour of the applicable time period:		
Land Use/Zone	**Time of Day**	**Noise Level (dBA)**
Residential, Low Density (R-E, H-R, R-L-2, R-L-3)	7:00 a.m. to 6:00 p.m. 6:00 p.m. to 10:00 p.m. 10:00 p.m. to 7:00 a.m.	55 50 45
Residential, Medium and High Density, Hospital, Open Space (OS, R-M, R-H, MHP)	7:00 a.m. to 6:00 p.m. 6:00 p.m. to 10:00 p.m. 10:00 p.m. to 7:00 a.m.	60 55 50
Commercial Office, Resort Commercial, Mixed Use, Institutional (O, P, Rs-H, M-U)	7:00 a.m. to 6:00 p.m. 6:00 p.m. to 10:00 p.m. 10:00 p.m. to 7:00 a.m.	65 60 55
Commercial Neighborhood, General Commercial, Commercial Recreation, Light Industrial (C-N, C-G, I-L)	7:00 a.m. to 6:00 p.m. 6:00 p.m. to 10:00 p.m. 10:00 p.m. to 7:00 a.m.	70 65 60

Source: Rancho Mirage Municipal Code Section 8.45.030 Table A-1.

Table 2.14-2 describes noise level (dBA) adjustments made for cumulative periods of time less than 30 minutes in an hour, as set forth in the Noise Ordinance.

Table 2.13-2
Rancho Mirage Exterior Noise Level Limits: dBA Adjustments

For cumulative periods of time less than 30 minutes in an hour:	
Time Period	**dBA Adjustment**
15-30 minutes per hour	+3
10-15 minutes per hour	+5
5-10 minutes per hour	+10
1-5 minutes per hour	+15
Any period of time less than 1 minute per hour	+20

Source: Rancho Mirage Municipal Code Section 8.45.030 Table B-1.

The Noise Ordinance states that, if the measured ambient noise level exceeds the dBA limits shown in Table 2.14-1, the noise limits and their adjustments for the first three categories in Table 2.13-2 shall be increased in five dBA increments as needed to encompass or reflect said ambient noise level.[3] The maximum noise level under the last two categories in Table 2.13-2 shall be increased, if necessary, only to equal the ambient noise level.

Several activities and noise sources are exempt from the above-described noise limits, including "construction, alteration, repair, grading or improvement of any building, structure, road or improvement to real property for which a permit has been issued by the city if said construction occurs within the allowable hours set forth in Section 15.04.030(A)(10)." Per Section 15.04.030(A)(10), construction-related activities are prohibited between the hours of 7:00 p.m. and 7:00 a.m. on weekdays, and all day on Sundays and holidays, without the written permission of the Building Official or unless performed by the person actually occupying the buildings to be improved.

Vibration Standards

The City has not adopted specific, quantified vibration level standards. However, Rancho Mirage Municipal Code Section 17.18.080 addresses vibration in all new and modified uses and structures and states that "no vibration associated with any use shall be allowed which is discernible beyond the boundary line of the subject property."

[3] Rancho Mirage Municipal Code Section 8.45.030(C).

2.13.4 Environmental Setting

Noise can be defined as "unwanted sound." Excessive and/or sustained noise can contribute to both temporary and permanent physical impairments, such as hearing loss and increased fatigue, as well as stress, annoyance, anxiety, and other psychological reactions in humans. The evaluation and mitigation of noise in a community is essential to protecting the health and welfare of the general public, and preserving the inherent value of recreation, open space, and conservation lands. Furthermore, it can help define the need for additional remedial measures that mitigate noise problems.

Noise Measurements

The most common unit used to measure noise levels is the A-weighted decibel (dBA), which is a measurement of noise energy emitted from a monitored noise source. The A-weighted frequency scale has been adjusted to correlate noise or sound to the hearing range of the human ear, and ranges from 1.0 dBA at the threshold of hearing, to 140 dBA at the threshold of pain. A quiet library typically measures about 30 dBA, normal speech at 3 feet measures 60 dBA, and a jet flyover at 1,000 feet measures 110 dBA (Table 2.13-3).

Noise rating scales generally use measurements that are weighted and averaged over time. The Single Event Noise Exposure Level (SENEL) measures a single noise event in decibels. The equivalent sound level (L_{eq}) converts sound that varies over time to a constant level that emits the same amount of acoustic energy; it is used to describe the "average" noise levels in the environment. The day-night average sound level (Ldn) measures the cumulative noise exposure of a community and accounts for the subjective annoyance of noises that occur during normal sleeping hours. Ldn measurements combine hourly noise measurements over a 24-hour period, and apply a weighting penalty factor to those measurements occurring between 10:00 p.m. and 7:00 a.m. Community Noise Equivalent Levels (CNEL) is the weighted average of the intensity of a sound, with weighting penalty factors for noises that occur during nighttime hours (10:00 p.m. to 7:00 a.m.) and evening hours (7:00 p.m. to 10:00 p.m.), averaged over 24 hours.

Sound Propagation

Sound from a stationary point source propagates uniformly outward in a spherical pattern. Sound levels attenuate (decrease) at a rate of 6± dB for each doubling of distance from the point source, and decrease at a rate of 3 dB for each doubling of distance from a line source, such as a highway. Acoustically soft sites (such as soft dirt, grass, or bushes) between a noise source and receiver can increase sound absorption and result in an overall drop-off rate of 4.5 dB per doubling of distance from a line source. Sound levels can also be affected by atmospheric conditions, such as wind, temperature, and humidity. Buildings and other large objects between a noise source and receiver can also attenuate noise, depending on the size of the shield and frequency content of the noise source. Noise barriers, such as sound walls, can reduce noise levels by up to 10 to 15 dBA when properly sized and placed.

Land Use Compatibility

Elevated ambient noise levels can have a direct impact on the desirability of parks and open space, residences, and businesses, and can negatively affect their long-term social and economic viability. For this reason, land use compatibility with the surrounding noise environment is one of the most important aspects of a noise impact analysis. This includes the identification of sensitive receptors that are particularly sensitive to noise intrusion, such as residences, schools, libraries, churches, hospitals and other health care facilities, and nursing homes. Day care centers, parks, and other outdoor recreation and conservation areas may also be considered sensitive receptors. Moderately sensitive land uses include cemeteries, golf courses, country clubs, hotels and motels, and dormitories. The least sensitive uses include commercial and industrial developments, heavy manufacturing facilities, agricultural lands, parking lots, warehousing operations, and transit terminals. There can be a wide variation in human responses to noise and individual thresholds of annoyance. Typically, the more a new noise source exceeds the previous ambient noise level, the less acceptable the new noise will be. A comparison of the new noise levels to existing (ambient) noise levels can be used to evaluate the significance of a new noise source.

Noise standards have been developed by a variety of agencies to help reduce noise impacts to sensitive receptors and to enhance the overall noise environment of urban areas. Most local jurisdictions have adopted noise ordinances, which specify acceptable interior noise standards for various land uses. The California Office of Noise Control has established noise control guidelines to be used in developing Noise Elements of municipal General Plans.

Table 2.13-3
Typical Noise Levels

COMMON OUTDOOR ACTIVITIES	COMMON INDOOR ACTIVITIES	A - WEIGHTED SOUND LEVEL dBA	SUBJECTIVE LOUDNESS	EFFECTS OF NOISE
THRESHOLD OF PAIN		140	INTOLERABLE OR DEAFENING	HEARING LOSS
NEAR JET ENGINE		130		
		120		
JET FLY-OVER AT 300m (1000 ft)	ROCK BAND	110		
LOUD AUTO HORN		100	VERY NOISY	
GAS LAWN MOWER AT 1m (3 ft)		90		
DIESEL TRUCK AT 15m (50 ft), at 80 km/hr (50 mph)	FOOD BLENDER AT 1m (3 ft)	80		SPEECH INTERFERENCE
NOISY URBAN AREA, DAYTIME	VACUUM CLEANER AT 3m (10 ft)	70	LOUD	
HEAVY TRAFFIC AT 90m (300 ft)	NORMAL SPEECH AT 1m (3 ft)	60		
QUIET URBAN DAYTIME	LARGE BUSINESS OFFICE	50	MODERATE	SLEEP DISTURBANCE
QUIET URBAN NIGHTTIME	THEATER, LARGE CONFERENCE ROOM (BACKGROUND)	40		
QUIET SUBURBAN NIGHTTIME	LIBRARY	30	FAINT	NO EFFECT
QUIET RURAL NIGHTTIME	BEDROOM AT NIGHT, CONCERT HALL (BACKGROUND)	20		
	BROADCAST/RECORDING STUDIO	10	VERY FAINT	
LOWEST THRESHOLD OF HUMAN HEARING	LOWEST THRESHOLD OF HUMAN HEARING	0		

Groundbourne Vibration

Vibration is the periodic oscillation of an object or medium. Groundborne vibration can be caused by natural or man-made sources, such as earthquakes, landslides, explosions, machinery, trains, and construction equipment. Methods of quantifying vibration include the peak particle velocity (PPV) that typically measures vibration impacts to buildings, and the root mean square (RMS) which measures vibration impacts to the human body using decibel notation (VdB). The approximate threshold for human perception of vibration is 65 VdB, roughly equivalent to the vibration generated by a typical bus or truck.[4] Construction equipment, including bulldozers, jackhammers, and loaded trucks, typically cause vibrations between 58 and 87 VdB at a distance of 25 feet (Table 2.13-4). The threshold at which minor damage can occur in fragile buildings is 100 VdB.

[4] Exhibit 2-C, Hazelden Betty Ford Center Noise Impact Analysis, Urban Crossroads, February 9, 2020.

Table 2.13-4
Vibration Source Levels for Construction Equipment

Equipment	Vibration Decibels (VdB) at 25 feet[1]
Small bulldozer	58
Jackhammer	79
Loaded Trucks	86
Large bulldozer	87
Source: Table 6-5, Hazelden Betty Ford Center Noise Impact Analysis, Urban Crossroads, February 9, 2020.	

Structural and human responses to ground-borne vibration can vary from barely perceptible to high levels of annoyance or difficulty performing tasks. Sensitive receivers for vibration include structures (particularly older masonry structures), people (particularly residents, the elderly, and sick), and vibration-sensitive equipment or activities.

Rancho Mirage Noise Environment

The noise environment in Rancho Mirage is generally quiet. The primary noise source is vehicle traffic on highways, particularly Interstate-10 and Highway 111, and local roads. Traffic noise levels vary based on traffic volumes and speeds, the percentage of trucks, and the composition and condition of roadway surfaces. The City experiences some noise from aircraft flyovers, but it is outside the noise compatibility contours of the Palm Springs International Airport and Bermuda Dunes Airport and, therefore, is not exposed to intrusive aircraft noise levels.[5] Passing trains on the Union Pacific Railroad (UPRR) immediately south of Interstate-10 generate intrusive noise events for land in the immediate vicinity; however, they are intermittent and of relatively short duration. Other notable noise sources in Rancho Mirage include commercial operations (such as loading and materials transfer), operation of mechanical equipment, and outdoor concerts and sporting events.

According to the Rancho Mirage General Plan, future noise contours associated with General Plan build out will be highest along the I-10/UPRR corridor, Highway 111, and other arterials, particularly Monterey Avenue, Bob Hope Drive, Ramon Road, Dinah Shore Drive, Gerald Ford Drive, and Country Club Drive.[6]

2.13.5 Existing Conditions

Existing Ambient Noise Levels

To assess the existing ambient noise environment in the Project study area, 24-hour noise measurements were taken at five (5) locations in the Project study area in December 2019 (see Appendix G). Measurement locations were positioned as close to the nearest sensitive receptor locations surrounding the Project site as possible. Noise measurement locations are shown on Exhibit 2.13-1. Hourly noise levels were measured during typical weekday conditions over a 24-hour period.

The 24-hour existing noise level measurement results are shown in the following table and represent existing daytime and nighttime ambient noise conditions.

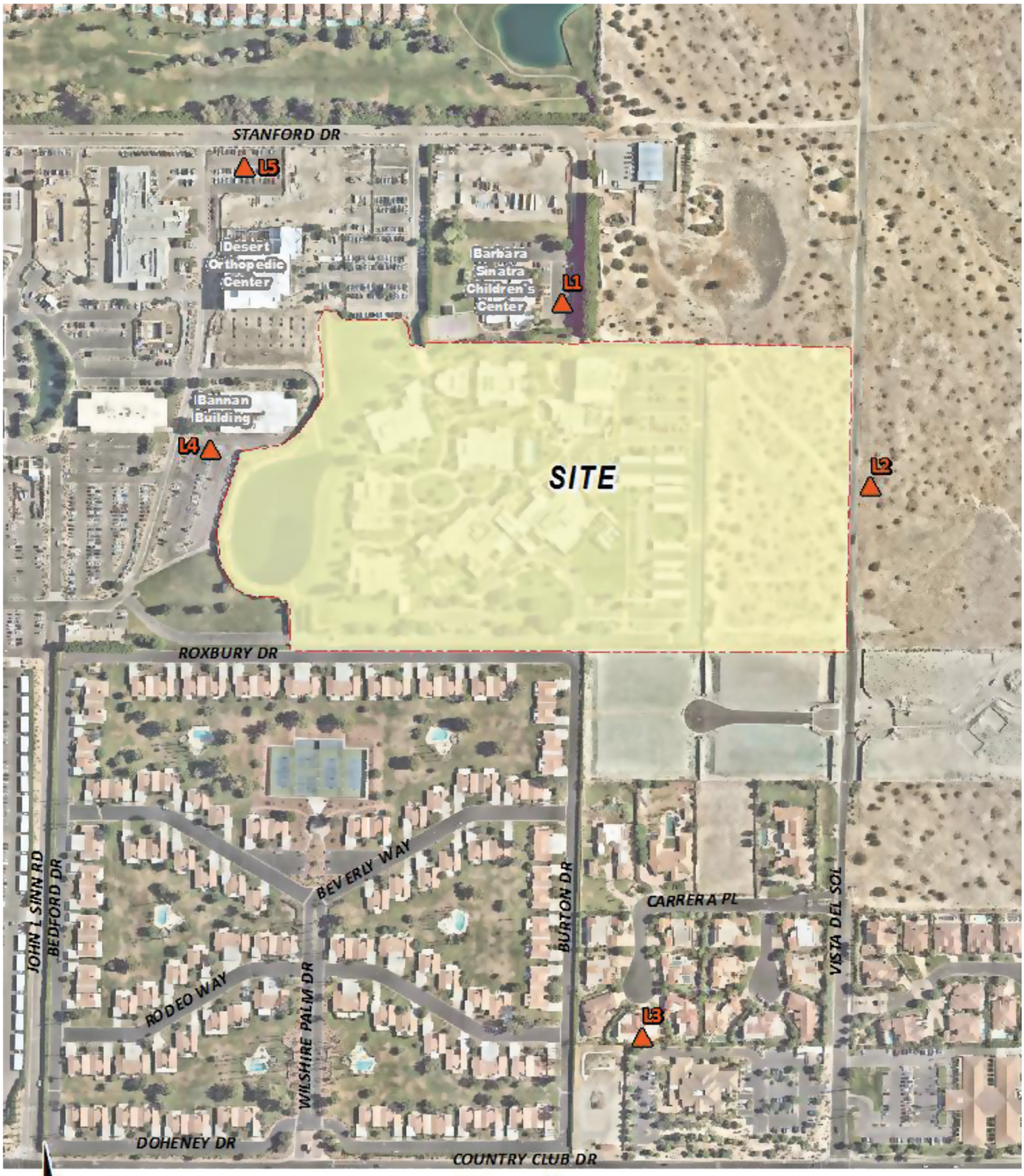
5 Maps PS-3 and BD-3, "Riverside County Airport Land Use Compatibility Plan," Riverside County Airport Land Use Commission, October 14, 2004.

6 Exhibit 18: Future Noise Contours, Rancho Mirage General Plan 2017 Update.

Table 2.13-5
24-Hour Ambient Noise Level Measurements

Noise Measurement Location	Description	Energy Average Noise Level (dBA L_{eq})		
		Daytime	Evening	Nighttime
L1	Located north of the Project site near the Barbara Sinatra Children's Center.	51.5	49.7	47.4
L2	Located east of the Project site on Vista Del Sol next to vacant residential land.	51.0	49.0	48.9
L3	Located south of the Project site near Oral, Facial and Implant surgery offices.	56.2	52.4	49.9
L4	Located near the western boundary of the Project site by the Bannan Building.	56.3	52.4	51.5
L5	Located northwest of the Project site near Hal B. Wallis Building Cardiology.	61.6	52.2	56.2[1]

[1] The L5 nighttime noise level included a recurring noise event during the 6am hour on the date noise measurements were conducted. Typical L5 nighttime noise levels are expected to be lower than evening noise levels.
Source: Table 5-1, Hazelden Betty Ford Center Noise Impact Analysis, Urban Crossroads, February 9, 2020.



02.18.20

Source: Urban Crossroads, 2020

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Hazelden Betty Ford Center PDP EIR
Noise Measurement Locations
Rancho Mirage, California

Hazelden Betty Ford Foundation

Exhibit 2.13-1

Existing Off-Site Traffic Noise

Existing (2019) traffic noise levels in the Project study area are shown in the table below. The noise contours reflect modeling of vehicular noise on area roadways. They are measured from the center of the roadway for the 70, 65, and 60 dBA noise levels and represent the distance to noise levels of a constant value. They range from 47.1 to 72.9 dBA CNEL without accounting for any noise attenuation features, such as noise barriers or topography.

Table 2.13-6
Existing (2019) Traffic Noise Contours (Without Project)

ID	Road	Segment	Receiving Land Use[1]	CNEL at Nearest Receiving Land Use (dBA)[2]	Distance to Contour from Centerline (ft.)		
					70 dBA CNEL	65 dBA CNEL	60 dBA CNEL
1	Bob Hope Dr.	n/o MacMillan Way/ Emerg. Rm. Access Rd.	POS	72.6	82	178	383
2	Bob Hope Dr.	s/o Street A	Hospital	71.7	72	154	332
3	Bob Hope Dr.	s/o Country Club Dr.	Office	71.8	73	157	339
4	John L. Sinn Rd.	s/o Street A	MDR/Hospital	62.0	RW	RW	41
5	Joe Friend Ln.	s/o MacMillan Way	Hospital	59.4	RW	RW	RW
6	Vista Del Sol	n/o Betty Ford Way	RE/Hospital	47.1	RW	RW	RW
7	Vista Del Sol	n/o Country Club Dr.	RE/Hospital	57.3	RW	RW	RW
8	MacMillan Way	e/o Bob Hope Dr.	POS/Hospital	61.6	RW	RW	38
9	Street A	e/o Bob Hope Dr.	Hospital	59.5	RW	RW	RW
10	Betty Ford Way	e/o Joe Friend Ln.	Hospital	58.8	RW	RW	RW
11	Country Club Dr.	w/o Bob Hope Dr.	LDR/Office	68.5	RW	94	203
12	Country Club Dr.	e/o Bob Hope Dr.	Hospital/Office	71.6	71	152	329
13	Country Club Dr.	e/o John L. Sinn Rd.	MDR/Office/Public/RE	72.7	83	180	387
14	Country Club Dr.	e/o Vista Del Sol	LDR/Office	72.9	86	185	398

[1] Source: City of Rancho Mirage General Plan, Chpt. 3, Exhibit 8, Circulation Roadway Plan
[2] The CNEL is calculated at the boundary of the right-of-way of each roadway and the property line of the nearest receiving land use.
"RW" = Location of the respective noise contour falls within the right-of-way of the road.
"POS" = Private Open Space
"MDR" = Medium Density Residential
"RE" = Residential Estate
"LDR" = Low Density Residential
Source: Table 7-1, Hazelden Betty Ford Center Noise Impact Analysis, Urban Crossroads, February 9, 2020.

Sensitive Receivers in the Project Area

Based on guidance provided by the Federal Highway Administration (FHWA), Caltrans, and the Federal Transit Administration, receiver locations are considered those located in outdoor living areas (e.g., backyards) at 10 feet from any existing or proposed barriers or at the building façade, whichever is closer to the Project site. Those located at greater distances would experience lower noise levels due to noise attenuation from distance and the shielding of intervening structures.

Five (5) sensitive receivers were identified in the Project study area, as shown in Exhibit 2.13-2:

- R1: the Barbara Sinatra Children's Center to the north
- R2: vacant land along Vista Del Sol to the east
- R3: multi-family dwellings at Wilshire Palms to the south
- R4: Bannan building to the west
- R5: Desert Orthopedic buildings to the west



LEGEND:

- Receiver Locations
- Distance from receiver to Project site boundary (in feet)
- 6' Existing Barrier Height (in feet)
- Existing Barrier

N

Source: Urban Crossroads, 2020

03.05.20

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Hazelden Betty Ford Center PDP EIR
Sensitive Receiver Locations
Rancho Mirage, California

Hazelden Betty Ford Foundation

Exhibit 2.13-2

Helipad Noise

The Eisenhower Medical Center helipad is approximately 1,000 feet northwest of the nearest existing building on the Project site. Flights to the EMC helipad originate primarily from the Palm Springs International Airport located to the northwest. These helicopter operations do not typically overfly the HBFC campus. They are used in the emergency transport of patients and supplies. In 2019, there were 110 helicopter landings at the EMC helipad, or an average of two landings per week.[7]

Development in the vicinity of the helipad is subject to helicopter noise during takeoffs, flyovers, and landings. Noise levels vary depending on the altitude and type of helicopter, as well as atmospheric and topographic conditions. Previously-measured noise levels for a typical twin-engine air ambulance at altitudes of 500 and 1,000 feet measured a maximum noise level (Lmax) of 96 dBA at a distance of 100 feet.[8] Noise data is also provided by the Federal Aviation Administration (FAA) for 26 types of U.S. certificated helicopters of various manufacturers, models, engine types, and blade counts and diameters.[9] The following table describes noise level ranges (low to high) for the entire data set of 26 helicopter types during takeoff, flyover, and approach. The data show that helicopter noise levels typically range from 80.2 to 99.5 EPNdB (effective perceived noise level in decibels) during various stages of flight. It is assumed that similar noise levels are generated by helicopters using the EMC helipad.

Table 2.13-7
Aircraft Noise Data for U.S. Certificated Helicopters

	Noise Level (EPNdB[1])	
	Low	**High**
During Takeoff	88.0	97.6
During Flyover	80.2	93.4
During Approach	87.9	99.5

[1] Effective Perceived Noise Level in Decibels
Source: Appendix 10, Noise Levels for U.S. Certificated and Foreign Aircraft, U.S. Department of Transportation, Federal Aviation Administration, May 25, 2012.

Noise levels generally fall off by 6 dBA per doubling of distance between the noise source and the receptor. Therefore, assuming the above values at 50 feet, at 100 feet the noise levels during helicopter flyovers would range from 74.2 to 93.5 EPNdB. At 200 feet, they would drop an additional 6± dBA, and the same at 400 and 800 feet. At the Project site (±1,000 feet from the helipad), noise levels would range from approximately 54.7 to 74.0 dB.

Per Section 8.45.050(D) of the Rancho Mirage Municipal Code, "any emission of sound for purposes of alerting persons to an emergency or the general emission of sound during performance of emergency work" is exempt from the provisions of the Noise Ordinance. This would include emergency helicopter activity at EMC.

2.13.6 Project Impacts

The following discussion analyzes whether the proposed Project will result in a substantial increase in ambient noise level in the vicinity of planning area. Additionally, this assessment utilizes local noise standards and applicable daytime exceptions as the significance thresholds for noise impacts. The assessment of vibration

7 Ali Tourkaman, Vice President Support Services, Eisenhower Medical Center Safety Department, March 2020.
8 "Environmental Impact Report for the Eisenhower Medical Center Specific Plan Amendment No. 3," page, III-121, City of Rancho Mirage, 2003.
9 Noise Levels for U.S. Certificated and Foreign Aircraft, U.S. Department of Transportation (Appendix 10), Federal Aviation Administration, May 25, 2012.

impacts was conducted using information on anticipated vibration during construction and operation of the Project planning area. For analysis purposes, periodic is defined as intermittent or short-term, and only construction activities are consistent with this definition.

Potential impacts related to demolition and construction noise were analyzed using a variety of factors, including the distance between project-related noise sources to noise-sensitive land uses, typical noise levels associated with construction equipment, the potential for construction noise levels associated with construction equipment, the potential for construction time limits or noise limits established in local ordinance. No meaningful noise impacts are associated with the operation and maintenance of the Project. Each impact discussion analyzes impacts on sensitive receptors nearest the Project planning area. Potentially significant impacts could result if the Project would:

a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Less Than Significant Impact.

Criteria for Determining Significance
The Project's noise impacts are considered significant if any of the following occur as a direct result of the Project.

Table 2.13-8
Significance Criteria Summary

Analysis	Receiving Land Use	Condition(s)	Significance Criteria	
			Daytime	Nighttime
Off-Site Traffic[1]	Noise-Sensitive[1,2]	If ambient is <60 dBA CNEL	≥5 dBA CNEL Project increase	
		If ambient is 60-65 dBA CNEL	≥3 dBA CNEL Project increase	
		If ambient is >65 dBA CNEL	≥1.5 dBA CNEL Project increase	
	Non-Noise-Sensitive[1,2]	If ambient is <70 dBA CNEL	≥5 dBA CNEL Project increase	
		If ambient is >70 dBA CNEL	≥3 dBA CNEL Project increase	
Operational	Residential[3]	Exterior Noise Level Standards	See Table 2.14-9	
		If ambient is <60 dBA L_{eq}[1]	≥5 dBA L_{eq} Project increase	
		If ambient is 60-65 dBA L_{eq}[1]	≥3 dBA L_{eq} Project increase	
		If ambient is >65 dBA L_{eq}[1]	≥1.5 dBA L_{eq} Project increase	
Construction	Noise-Sensitive	Permitted between 7:00 a.m. to 6:00 p.m. Monday to Saturdays; no activity allowed on Sundays or holidays.[4]		
		Noise Level Threshold[5]	85 dBA L_{eq}	n/a
		Vibration Level Threshold[6]	80 VdB	n/a

[1] Source: FICON, 1992.
[2] Source: City of Rancho Mirage General Plan Noise Element.
[3] Source: City of Rancho Mirage Municipal Code, Section 8.45.030.
[4] Source: City of Rancho Mirage Municipal Code, Section 15.04.030.
[5] Acceptable threshold for construction noise based on the Criteria for Recommended Standard: Occupational Noise Exposure prepared by the National Institute for Occupational Safety and Health.
[6]Source: Federal Transit Administration, Transit Noise and Vibration Impact Assessment.
"Daytime" = 7:00 a.m. to 10:00 p.m.; "Nighttime" = 10:00 p.m. to 7:00 a.m.
Source: Table 4-1, Hazelden Betty Ford Center Noise Impact Analysis, Urban Crossroads, February 9, 2020.

Table 2.13-9
Operational Noise Standards

Land Use[1]	Time Period	Exterior Noise Level Standards (dBA L_{eq})[2]
Residential	Daytime (7:00 a.m. to 6:00 p.m.)	55
	Evening (6:00 p.m. to 10:00 p.m.)	50
	Nighttime (10:00 p.m. to 7:00 a.m.)	45

[1] Source: City of Rancho Mirage Municipal Code, section 8.45.030 Exterior noise level limits.
[2] L_{eq} represents a steady state sound level containing the same total energy as a time varying signal over a given sample period.
Source: Table 3-1, Hazelden Betty Ford Center Noise Impact Analysis, Urban Crossroads, February 9, 2020.

Potential Construction Noise Impacts
The Project would generate noise during demolition, site preparation, grading, building construction, paving, and the application of architectural coatings. Noise sources are expected to include trucks and heavy machinery, power tools, concrete mixers, portable generators, and related equipment. The highest noise impacts would occur when construction activities take place at the closest point from the edge of the construction activity areas to the nearest sensitive receiver locations.

Noise prediction modeling for the Project determined that unmitigated construction noise levels are expected to range from 52.1 to 74.6 dBA L_{eq} at R1 through R5, the sensitive receiver locations identified in the study area.[10] These levels are less than the acceptable noise level threshold (85 dBA L_{eq}) described in Table 2.13-8. Per Rancho Mirage Municipal Code Section 15.04.030, project construction noise is exempt from noise limits if activities occur between 7:00 a.m. and 7:00 p.m. on weekdays. Therefore, noise impacts resulting from Project construction are considered less than significant at all noise sensitive receiver locations.

Potential Operational Noise Impacts
Project-related operational noise is expected to be generated by stationary sources, such as air conditioning units, parking lot activity (cars pulling in and out, people talking), and outdoor courtyard activity. Operational noise levels for the proposed Project were estimated using noise projection modeling and noise measurements recorded at comparable stationary sources and adjusted for Project-specific characteristics, such as topography, building and noise source heights, barriers and berms, and noise receiver locations and heights. Table 2.13-10 shows Project operational noise levels at R1 through R5, the five sensitive receiver locations identified in the study area. Noise levels would range from 39.2 to 49.8 dBA L_{eq} during daytime hours (7:00 a.m. to 7:00 p.m.); 39.2 to 49.8 dBA L_{eq} during evening hours (7:00 p.m. to 10:00 p.m.); and 34.1 to 43.1 dBA L_{eq} during nighttime hours (10:00 p.m. to 7:00 a.m.). The values do not exceed the City's 55 dBA L_{eq} daytime, 50 dBA L_{eq} evening, and 45 dBA L_{eq} nighttime exterior noise level thresholds.

Table 2.13-10
Project Operational Noise Levels

Receiver Location[1]	Project Operational Noise Levels (dBA L_{eq})[2]			Noise Level standards (dBA L_{eq})[3]			Threshold Exceeded?[4]		
	Day	Eve.	Night	Day	Eve.	Night	Day	Eve.	Night
R1	49.8	49.8	41.3	55	50	45	No	No	No
R2	48.6	48.6	43.1	55	50	45	No	No	No
R3	44.2	44.2	34.8	55	50	45	No	No	No
R4	40.6	40.6	34.1	55	50	45	No	No	No
R5	39.2	39.2	35.5	55	50	45	No	No	No

Source: Table 9-2, Hazelden Betty Ford Center Noise Impact Analysis, Urban Crossroads, February 9, 2020.

[10] Table 10-2, Hazelden Betty Ford Center Noise Impact Analysis, Urban Crossroads, February 9, 2020.

When separated from ambient daytime, evening, and nighttime conditions, the Project's unmitigated noise level increases would range from 0.0 to 4.4 dBA L_{eq} at the five sensitive receiver locations. The Project's operational noise level contributions satisfy the operational noise level increase significance criteria presented in Table 2.13-8 and, therefore, impacts would be less than significant.

Potential Traffic Noise Impacts
The Project will generate additional traffic and traffic noise on off-site area roadways. The following table compares existing 2019 traffic noise levels with and without the Project.

Table 2.13-11
Existing 2019 Traffic Noise Level Increases With Project

ID	Road	Segment	Receiving Land Use[1]	Noise-Sensitive Land Use?	CNEL at Receiving Land Use (dBA)[1]			Noise Level Increase Significance Criteria[2]	
					No Project	With Project	Project Increase	Criteria	Exceed?
1	Bob Hope Dr.	n/o MacMillan	POS	Yes	72.6	72.6	0.0	1.5	No
2	Bob Hope Dr.	s/o Street A	Hospital	Yes	71.7	71.7	0.0	1.5	No
3	Bob Hope Dr.	s/o Country Club	Office	No	71.8	71.9	0.1	3.0	No
4	John L. Sinn Rd	s/o Street A	MDR/Hospital	Yes	62.0	62.2	0.2	3.0	No
5	Joe Friend Ln.	s/o MacMillan	Hospital	Yes	59.4	59.5	0.1	5.0	No
6	Vista Del Sol	n/o Betty Ford Wy	RE/Hospital	Yes	47.1	48.7	1.6	5.0	No
7	Vista Del Sol	n/o Country Club	RE/Hospital	Yes	57.3	58.0	0.7	5.0	No
8	MacMillan	e/o Bob Hope Dr.	POS/Hospital	Yes	61.6	61.6	0.0	3.0	No
9	Street A	e/o Bob Hope Dr.	Hospital	Yes	59.5	59.6	0.1	5.0	No
10	Betty Ford Way	e/o Joe Friend Ln.	Hospital	Yes	55.8	57.0	1.2	5.0	No
11	Country Club	w/o Bob Hope Dr.	LDR/Office	Yes	68.5	68.6	0.1	1.5	No
12	Country Club	e/o Bob Hope Dr.	Hospital/Office	Yes	71.6	71.7	0.1	1.5	No
13	Country Club	e/o John L. Sinn	MDR/Off/Public/RE	Yes	72.7	72.7	0.0	1.5	No
14	Country Club	e/o Vista Del Sol	LDR/Office	Yes	72.9	73.0	0.1	1.5	No

[1] The CNEL is calculated at the boundary of the right-of-way of each roadway and the property line of the receiving land use.
[2] Does Project create an off-site transportation related noise level increase exceeding the significance criteria (Table 2.13-8)?
Source: Table 7-9, Hazelden Betty Ford Center Noise Impact Analysis, Urban Crossroads, February 9, 2020.

As shown, with the Project, off-site traffic noise levels would be 0.0 to 1.6 dBA CNEL greater than without the Project. These increases do not exceed significance criteria. Actual noise levels may be lower due to noise attenuation features, such as noise barriers or topography. Impacts are considered less than significant.

b) Generation of excessive groundborne vibration or groundborne noise levels?

Less Than Significant Impact.

Demolition and construction associated with the Project can be expected to generate short-term, intermittent, and localized groundborne vibration from the operation of trucks and heavy construction equipment. As shown in Table 2.13-4, typical vibration levels for construction equipment, including bulldozers, jackhammers, and loaded trucks, typically cause vibrations between 58 and 87 VdB at a distance of 25 feet. The degree of vibration would vary depending on the types of equipment and methods used, soil types, and distance to affected structures.

Project-related vibration levels were estimated using data and methodologies published by the Federal Transit Administration (FTA). The analysis determined that the highest construction vibration levels would range from 61.7 to 76.0 VdB at nearby sensitive receiver locations R1 through R5.[11] These values are less than the 80 VdB residential vibration thresholds identified by the FTA and described in Table 2.13-8, above. Additionally,

[11] Table 10-4, Ibid.

vibration levels at R1 through R5 are anticipated to occur only during times that heavy construction equipment is operating simultaneously adjacent to the Project site perimeter. Therefore, Project-related vibration impacts are considered less than significant.

No groundborne vibration or noise is anticipated during long-term operation of the Project.

c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise level?

Less Than Significant Impact.

The Project site is not within the vicinity of a private airstrip or within two miles of a public airport or public use airport. It is not contained within an airport land use plan. The Palm Springs International Airport is approximately 6½ miles northwest of the Project site, and the Bermuda Dunes Airport is approximately 7 miles to the east. No airport noise-related impacts would occur.

The EMC helipad is ±1,000 feet northwest of the nearest existing and future building on the Project site. Existing buildings on the Project site are currently impacted by helipad operations which, as explained in Section 2.13.5, are intermittent and of short duration. Noise levels vary depending on helicopter type, flight path, and altitude, as well as atmospheric conditions.

The Project would have no impact on helicopter operations, and helicopter noise would continue to be produced during take-offs, flyovers, and approaches. The Project would demolish the four buildings on the west side of the Project site (nearest to the helipad) and replace them with two new buildings on the same (slightly larger) building locations. The distance between the new buildings and the helipad would remain generally unchanged. New buildings would be built to current building codes, which will result in improved noise insulation compared to existing buildings constructed in the early 1980s, thereby reducing interior noise impacts.

Given the limited nature of helipad operations and the short duration of noise-intrusive events, potential noise impacts to the Project would not expose people residing or working in the Project area to excessive noise levels. As noted in Section 2.13.5, sound emitted for the purposes of alerting persons to an emergency and the general emission of sound during performance of emergency work is exempt from the noise standards of the City Noise Ordinance. Impacts would be less than significant.

2.13.7 Mitigation Measures

Project impacts would be less than significant. No mitigation is required.

2.13.8 Significance After Mitigation

Project impacts would be less than significant.

2.13.9 Cumulative Impacts

The Project would generate additional traffic on off-site area roadways and, therefore, would increase traffic noise in the broader community.

Near-Term (2023) Cumulative Noise Impacts
The Noise Impact Analysis analyzed the Project's near-term cumulative traffic noise impacts in an *Existing Plus Ambient Plus Cumulative (EAC) (2023)* scenario. The EAC 2023 scenario represents traffic noise in year 2023

(anticipated Project buildout) and accounts for existing 2019 noise, plus noise from the Project, plus noise from cumulative background growth anticipated between 2019 and 2023. The scenario is based on the same future traffic and growth assumptions described in Section 2.16.9, Transportation and Traffic, of this DEIR.

The following table compares EAC 2023 off-site traffic noise levels with and without the Project. With the Project, traffic noise levels would be 0.0 to 1.1 dBA CNEL greater than without the Project. These increases do not exceed significance criteria. Actual noise levels may be lower due to noise attenuation features, such as noise barriers or topography. Impacts would be less than significant.

Table 2.13-12
EAC 2023 Traffic Noise Level Increases With Project

ID	Road	Segment	Receiving Land Use[1]	Noise-Sensitive Land Use?	CNEL at Receiving Land Use (dBA)[1]			Noise Level Increase Significance Criteria[2]	
					No Project	With Project	Project Increase	Criteria	Exceed?
1	Bob Hope Dr.	n/o MacMillan	POS	Yes	73.2	73.2	0.0	1.5	No
2	Bob Hope Dr.	s/o Street A	Hospital	Yes	72.4	72.4	0.0	1.5	No
3	Bob Hope Dr.	s/o Country Club	Office	No	72.4	72.4	0.0	3.0	No
4	John L. Sinn Rd	s/o Street A	MDR/Hospital	Yes	62.4	62.6	0.2	3.0	No
5	Joe Friend Ln.	s/o MacMillan	Hospital	Yes	59.8	59.9	0.1	5.0	No
6	Vista Del Sol	n/o Betty Ford Wy	RE/Hospital	Yes	49.6	50.6	1.0	5.0	No
7	Vista Del Sol	n/o Country Club	RE/Hospital	Yes	57.9	58.5	0.6	5.0	No
8	MacMillan	e/o Bob Hope Dr.	POS/Hospital	Yes	61.9	62.0	0.1	3.0	No
9	Street A	e/o Bob Hope Dr.	Hospital	Yes	59.8	59.9	0.1	5.0	No
10	Betty Ford Way	e/o Joe Friend Ln.	Hospital	Yes	56.1	57.2	1.1	5.0	No
11	Country Club	w/o Bob Hope Dr.	LDR/Office	Yes	68.9	69.0	0.1	1.5	No
12	Country Club	e/o Bob Hope Dr.	Hospital/Office	Yes	72.2	72.2	0.0	1.5	No
13	Country Club	e/o John L. Sinn	MDR/Off/Public/RE	Yes	73.2	73.2	0.0	1.5	No
14	Country Club	e/o Vista Del Sol	LDR/Office	Yes	73.3	73.4	0.1	1.5	No

[1] The CNEL is calculated at the boundary of the right-of-way of each roadway and the property line of the receiving land use.
[2] Does Project create an off-site transportation related noise level increase exceeding the significance criteria (Table 2.13-8)?
Source: Table 7-11, Hazelden Betty Ford Center Noise Impact Analysis, Urban Crossroads, February 9, 2020.

Long-Term (2040) Cumulative Noise Impacts

The Noise Impact Analysis analyzed the Project's long-term cumulative traffic noise impacts a *General Plan Buildout 2040* scenario. The scenario represents traffic noise in year 2040 (General Plan buildout) and accounts for noise from the Project, plus noise from cumulative growth anticipated through year 2040. The scenario is based on the same assumptions described in Section 2.16.9, Transportation and Traffic, of this DEIR.

The following table compares General Plan Buildout 2040 off-site traffic noise levels with and without the Project. With the Project, traffic noise levels would be 0.0 to 0.9 dBA CNEL greater than without the Project. These increases do not exceed significance criteria. Actual noise levels may be lower due to noise attenuation features, such as noise barriers or topography. Impacts would be less than significant.

Table 2.13-13
General Plan Buildout 2040 Traffic Noise Level Increases With Project

ID	Road	Segment	Receiving Land Use[1]	Noise-Sensitive Land Use?	CNEL at Receiving Land Use (dBA)[1]			Noise Level Increase Significance Criteria[2]	
					No Project	With Project	Project Increase	Criteria	Exceed?
1	Bob Hope Dr.	n/o MacMillan	POS	Yes	73.6	73.6	0.0	1.5	No
2	Bob Hope Dr.	s/o Street A	Hospital	Yes	72.8	72.8	0.0	1.5	No
3	Bob Hope Dr.	s/o Country Club	Office	No	72.8	72.9	0.1	3.0	No
4	John L. Sinn Rd	s/o Street A	MDR/Hospital	Yes	63.0	63.1	0.1	3.0	No
5	Joe Friend Ln.	s/o MacMillan	Hospital	Yes	60.3	60.4	0.1	5.0	No
6	Vista Del Sol	n/o Betty Ford Wy	RE/Hospital	Yes	59.7	60.0	0.3	5.0	No
7	Vista Del Sol	n/o Country Club	RE/Hospital	Yes	59.7	60.0	0.3	5.0	No
8	MacMillan	e/o Bob Hope Dr.	POS/Hospital	Yes	62.4	62.5	0.1	3.0	No
9	Street A	e/o Bob Hope Dr.	Hospital	Yes	60.3	60.4	0.1	5.0	No
10	Betty Ford Way	e/o Joe Friend Ln.	Hospital	Yes	57.6	58.5	0.9	5.0	No
11	Country Club	w/o Bob Hope Dr.	LDR/Office	Yes	72.5	72.5	0.0	1.5	No
12	Country Club	e/o Bob Hope Dr.	Hospital/Office	Yes	74.3	74.3	0.0	1.5	No
13	Country Club	e/o John L. Sinn	MDR/Off/Public/RE	Yes	74.3	74.3	0.0	1.5	No
14	Country Club	e/o Vista Del Sol	LDR/Office	Yes	74.3	74.3	0.1	1.5	No

[1] The CNEL is calculated at the boundary of the right-of-way of each roadway and the property line of the receiving land use.
[2] Does Project create an off-site transportation related noise level increase exceeding the significance criteria (Table 2.13-8)?
Source: Table 7-12, Hazelden Betty Ford Center Noise Impact Analysis, Urban Crossroads, February 9, 2020.

2.14 Population, Housing and Socio-Economic Resources

2.14.1 Introduction

This section of the EIR describes existing population, housing, and socio-economic conditions in the Project area, as well as issues associated with environmental justice. It analyzes the potential impacts of the proposed Project on those resources, including changes in population and the demand for housing. The analysis is based, in part, on data and information from a variety of sources and agencies.

2.14.2 Thresholds of Significance

Population and Housing
Project impacts to population and housing are analyzed using the thresholds of significance provided in Appendix G of the CEQA Guidelines. Appendix G uses the following questions to evaluate the project's potential impacts.

Would the project:

a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

Environmental Justice
Currently, CEQA does not use the term "environmental justice" and does not provide formal procedures or significance thresholds for the analysis of environmental justice impacts. However, CEQA does state that economic and social effects may be considered in determining whether a project's physical changes are significant. Therefore, potential environmental justice impacts of the proposed Project are analyzed in a broad context that considers whether the physical changes associated with the Project would result in indirect adverse social or economic impacts to the community.

2.14.3 Regulatory Framework

Population and Housing

Federal

No federal regulations related to population, housing, or socio-economic resources would be applicable to the proposed Project.

State

No state regulations related to population, housing, or socio-economic resources would be applicable to the proposed Project.

Regional/Local

Rancho Mirage General Plan
The Rancho Mirage General Plan (2017 Update) Land Use and Housing Elements describe existing housing characteristics and future housing needs and strategies, and set forth the City's long-term residential goals, policies, and programs. Goals include preserving the City's predominantly low-density, high-quality residential

character and accommodating a variety of housing types, including those that meet the needs of lower income households. The Economic and Fiscal Element evaluates existing economic conditions and guides the City's future economic vision. Goals include a growing and balanced economic base that serves the City's needs and maintains high standards of development and environmental protection, and a prudent and progressive financial management program.

Regional Transportation Plan/Sustainable Communities Strategy

The Southern California Association of Governments (SCAG) adopted the "2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS)" in 2016. The RTP/SCS is a long-range plan that coordinates regional land use and transportation strategies and strives for environmental sustainability, increased transportation capacity, response to demographic and housing market changes, and support of economic growth. It includes regional population, household, and employment growth forecasts and sets forth strategies and policies to balance future mobility and housing needs with projected population growth.

Environmental Justice

Federal

Executive Order 12898

Executive Order (EO) 12898, *Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations* (1994), requires federal agencies to identify and address, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low-income populations in the United States. It also directed each federal agency to develop an agency-wide strategy for implementing environmental justice in its programs, policies, planning and public participation processes, enforcement, and rulemaking. The Council on Environmental Quality (CEQ) has oversight of the federal government's compliance with EO 12898 and the National Environmental Policy Act (NEPA).

Fair Housing Act

The federal Fair Housing Act (24 C.F.R. Part 100) prohibits discrimination related to the sale or rental of dwellings, the provision of services in connection therewith, and the availability of residential real estate-related transactions. Section 100.201 addresses discrimination due to handicap; "handicap" includes individuals with a record of having a physical or mental impairment, including drug addiction (other than addiction caused by current, illegal use of a controlled substance) and alcoholism, such that it limits major life activities. It includes those recovering in licensed detoxification facilities and those living in "clean and sober" living facilities.

State

California considers individuals who are in treatment for drug or alcohol abuse to be disabled under the Fair Housing Act. For this reason, treatment centers cannot be completely restricted from an area. However, one treatment center cannot be within 300 feet of another treatment center. In general, outpatient treatment centers and partial hospitalization programs are held to the same standards and requirements as residential rehab centers. They require licensure if they provide certain services, and they do not if they offer nonmedical treatment. All treatment centers are still subject to county or city regulations and requirements for establishing a business.

California Government Code

Government Code Section 65040.12 defines environmental justice as "the fair treatment of people of all races, cultures, and incomes with respect to the development, adoption, implementation, and enforcement of environmental laws, regulations, and policies."

California Environmental Quality Act

CEQA focuses on whether a project may have a significant effect on the physical environment. It does not use the term "environmental justice"; however, issues associated with environmental justice are reflected in well-established CEQA principles. According to Public Resources Code Section 21083(b)(3), an agency is required to find that a project may have a significant effect on the environment if, among other things, "the environmental effects of a project will cause substantial adverse effects on human beings, either directly or indirectly."

Senate Bill 1000

Senate Bill (SB) 1000 added to the required elements of the general plan in Government Code Section 65302(h) an environmental justice element, or related goals, policies, and objectives integrated in other elements, that identifies disadvantaged areas within the area covered by the general plan if the city, county, or city and county has a disadvantaged community. The element must also identify objectives and policies to reduce the unique or compounded health risks in disadvantaged communities. "Disadvantaged community" means an area identified by the California Environmental Protection Agency pursuant to Section 39711 of the Health and Safety Code (defined below) or an area that is a low-income area that is disproportionately affected by environmental pollution and other hazards that can lead to negative health effects, exposure, or environmental degradation. "Low-income area" means an area with household incomes at or below 80 percent of the statewide median income or with household incomes at or below the threshold designated as low income by the Department of Housing and Community Development's list of state income limits adopted pursuant to Section 50093 of the Health and Safety Code.

California Health and Safety Code

Section 39711 of the Health and Safety Code requires CalEPA to identify "disadvantaged communities" based on geographic, socioeconomic, public health, and environmental hazard criteria. They may include, but are not limited to, either of the following: 1) areas disproportionately affected by environmental pollution and other hazards that can lead to negative health effects, exposure, or environmental degradation, 2) areas with concentrations of people that are of low income, high unemployment, low levels of home ownership, high rent burden, sensitive populations, or low levels of educational attainment.

Assembly Bill 1553

Assembly Bill (AB) 1553 requires the Office of Planning and Research (OPR) to provide guidance for local jurisdictions to address environmental justice considerations in planning for the equitable distribution of public facilities and services, industrial facilities, schools and residential dwellings, and transit-oriented development.

Regional/Local

Rancho Mirage General Plan

The Rancho Mirage General Plan (2017 Update) Public Services and Facilities Element (Health Services section) describes health facilities and services in the City, including the Betty Ford Center. According to the General Plan, "the availability of health care is an essential component of community planning" and "the Betty Ford Center offers help and hope to individuals and their family members affected by alcoholism and/or addiction to other drugs." According to the California Health Care Foundation, in 2018 about 8% of Californians met criteria for substance use disorder, but only 10% of people with a substance use disorder received any type of treatment[1]. This underscores the importance of HBFC in treating the health needs of the community.

[1] "Substance Use in California: A Look at Addiction and Treatment", prepared by the California Health Care Foundation. October 2018

The following General Plan goals and policies address the provision of health care services in Rancho Mirage:

Goal PS&F 8 High quality of health care facilities and services to promote the good health and well-being of Rancho Mirage's residents.

Policy PS&F 8.1 Coordinate with all medical service providers to assure adequate health care facilities and services to meet the needs of Rancho Mirage's residents.

Policy PS&F 8.2 Encourage the development of medical and health care facilities that address the changing demographics and the City's desire to expand the economic base of the community.

Policy PS&F 8.3 The EMC Specific Plan shall serve as the development guide for the campus.

Policy PS&F 8.4 Locate hospitals, convalescent, assisted care, and similar type facilities in areas no subject to excessive noise levels.

Regional Transportation Plan/Sustainable Communities Strategy

SCAG's 2016-2040 RTP/SCS, described above, is based on the principles of social equity and environmental justice. As a government agency that receives federal funding, SCAG is required to conduct an environmental justice analysis for the RTP/SCS. Specifically, SCAG must: 1) ensure that the low-income and minority communities have opportunities to participate in the decision-making process, and 2) identify whether such communities receive an equitable distribution of benefits from the RTP/SCS and not a disproportionate share of the burdens.[2] It includes performance measures that monitor access to parks and natural lands, roadway noise impacts, air quality impacts, and public health impacts, among others.

SCAQMD Environmental Justice Advisory Group

The South Coast Air Quality Management District (SCAQMD) has adopted guiding principles and initiatives to ensure environmental justice for all segments of the population. Its Environmental Justice Advisory Group advises on the impact of air quality in ethnic communities, with emphasis on reduction and prevention of air pollution. Its Children's Air Quality Agenda includes action initiatives specifically geared toward minimizing the effects of air pollution on children. The Environmental Justice Community Partnership builds and strengthens community relationships for the purpose of achieving clean air and healthy communities for everyone.

2.14.4 Environmental Setting

Population

City and County population data are shown in Table 2.15-1. The Rancho Mirage population increased 30% between 2000 and 2010, from 13,249 to 17,218. The latest (2019) population estimate is 18,489. SCAG projects the City's population will grow to 25,000 by 2040.

The population of Riverside County increased 42% between 2000 and 2010, from 1.54 million to nearly 2.19 million. The latest (2019) population estimate is 2.44 million. It is projected to grow to 3.1 million by 2040.

[2] Southern California Association of Governments 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy, Environmental Justice Appendix, adopted April 2016

Table 2.14-1
Regional Population Trends

	2000	2010	2019	2040 Forecast
Rancho Mirage	13,249	17,218	18,489	25,000
Riverside County	1,545,387	2,189,641	2,440,124	3,183,000

Sources: 2000 and 2010: U.S. Census
2019: Report E5: City/County Population and Housing Estimates, January 1, 2019, CA Dept. of Finance.
2040 Forecast: Tables 8 and 11, Current Demographics and Growth Forecast Appendix, 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy, Southern California Association of Governments.

Housing

Local housing products include a mix of single- and multi-family units, and a smaller number of mobile homes. In 2019, there were 14,596 housing units in Rancho Mirage (Table 2.15-2). The majority (54.5%) were single-family detached units. The vacancy rate was 38.7% (Table 2.15-3). The relatively high vacancy rate is largely due to a robust tourism industry and warm climate that attracts seasonal residents and has created a strong second home and vacation rental market. The City has an average of 2.06 persons per household.

Table 2.14-2
Rancho Mirage Housing Characteristics

Unit Type	Number of Units	% of Total Units
Single-family detached	7,952	54.5%
Single-family attached	4,187	28.7%
Multi-family, 2-4 units	725	5.0%
Multi-family 5+ units	835	5.7%
Mobile homes	897	6.1%
Total:	14,596	100.0%

Source: Report E-5: City/County Population and Housing Estimates, January 1, 2019, California Department of Finance.

Table 2.14-3
Rancho Mirage Housing Tenure

	Number of Units	% of Total Units
Occupied Units	8,942	61.3%
Vacant Units	5,654	38.7%
Total:	14,596	100.0%
Average persons per household: 2.06		

Source: Report E-5: City/County Population and Housing Estimates, January 1, 2019, California Department of Finance.

In 2019, the median value of existing homes was $674,500, and the median value of new homes was $530,500 in Rancho Mirage.[3]

[3] "Inland Empire Quarterly Economic Report: Inland Empire City Profile 2019," Year 31, Economic & Politics, Inc., October 2019.

Employment and Income

The tourism industry is the greatest contributor to the regional Coachella Valley economy, generating millions of dollars in sales, hotel, and other taxes, and employing thousands of valley residents. Visitors are attracted to the area's warm climate, world class golf courses, professional golf and tennis tournaments, hiking and other outdoor recreational opportunities, and music and film festivals. The eastern valley's agricultural industry has been an economic mainstay for more than a century, and the region is a top national producer of a variety of crops, most notably dates. In recent decades, the healthcare industry has also emerged as a major regional industry, with key hospital and treatment facilities located in Palm Springs, Rancho Mirage, and Indio.

An estimated 5,818 Rancho Mirage residents age 16 years and over are in the civilian labor force.[4] As shown in Table 2.15-4, the two largest employment industry sectors for City residents are "educational services, health care, and social assistance" and "finance, insurance, real estate, and leasing."

Table 2.14-4
Rancho Mirage Employment by Industry

Industry	No. of Employed Persons	% of Total Employed Persons
Agriculture, forestry, fishing, hunting, mining	11	0.2%
Construction	292	5.0%
Manufacturing	254	4.4%
Wholesale Trade	90	1.5%
Retail Trade	425	7.3%
Transportation, warehousing, utilities	219	3.8%
Information	157	2.7%
Finance, insurance, real estate, leasing	866	14.9%
Professional, scientific, management, administrative, waste management services	799	13.7%
Educational services, health care, social assistance	1,578	27.1%
Arts, entertainment, recreation, accommodation, food services	567	9.7%
Other services, except public administration	341	5.9%
Public administration	219	3.8%
Total:	5,818	100.0%

Source: 2013-2017 American Community Survey 5-Year Estimates.

The annual average unemployment rate in Rancho Mirage in 2018 was 3.5%.[5] The median household income of Rancho Mirage residents is $64,754.[6]

Disadvantaged Communities

CalEnviroScreen 3.0 is a science-based database created by CalEPA and the Office of Environmental Health (OEHHA) to identify California communities that are most affected by pollution and especially vulnerable to the effects of pollution. It aggregates environmental, health, and socioeconomic data to generate a numerical score for each census tract in the State. Higher scores indicate higher pollution burden and population vulnerability. Census tracts with scores of 75% or higher are designated as "disadvantaged communities."

4 2013-2017 American Community Survey 5-Year Estimates.
5 "Monthly Labor Force Data for Cities and Census Designated Places (CDP), Annual Average 2018-Revised, Data Not Seasonally Adjusted," California Employment Development Department.
6 2013-2017 American Community Survey 5-Year Estimates.

According to the most recent CalEnviroScreen 3.0 database update (June 2018), there are no disadvantaged communities in Rancho Mirage. The nearest disadvantaged communities are in the cities of Indio and Coachella, 9+ miles to the east.

2.14.5 Existing Conditions

Population
The HBFC is a temporary treatment facility with 100 beds. Therefore, it can house a maximum of 100 patients at a time on a short-term basis (generally maximum of 30 days). No patients live onsite permanently.

Housing
As shown in Table 2.15-5, the HBFC currently includes five (5) residential buildings totaling ±66,394 square feet and 100 beds. Occupancy is short-term and generally limited to 30-day stays. No permanent housing exists onsite.

Table 2.14-5
Existing Housing

Building Name	Square Feet (approx.)	Number of Beds
Fisher Hall	12,818	20
Pocklington Hall	12,894	20
McCallum Hall	12,988	20
North Hall	12,994	20
Ottenstein Hall	14,700	20
Total:	**66,394**	**100**

Existing housing in the Project vicinity includes: 1) duplex units at the Wilshire Palms neighborhood to the south, 2) single-family units on Carrera Place to the southeast, and 3) and single- and multi-family units at the Rancho Mirage Country Club north of MacMillan Way/Emergency Room Access Road.

Employment
The HBFC currently employs 211 people.[7]

Disadvantaged Communities
No disadvantaged communities are located on the Project site or its vicinity.

2.14.6 Project Impacts

Would the Project:

a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

Less Than Significant Impact. As shown in Table 2.15-6, the Project would remove 80 existing beds (due to demolition) and add 136 new beds (due to new construction), thereby resulting in a net increase of 56 beds, for a total of 156 beds in 4 buildings. Residential treatment space would increase 40%, from approximately 66,394 to 92,919 square feet, and residential facilities would be modernized and updated.

[7] Laurie Skochil, Sr. Administrative Assistant to VP West Region/Administrator, HBFC, January 28, 2020.

The two new residential buildings would be located on the west end of the HBFC campus, with the southerly building located ±260 feet north of the closest residence at the Wilshire Palms condominium development to the south, and the northerly building located ±870 feet south of the closest residence in the Rancho Mirage Country Club subdivision to the north. The new Day Treatment building would be located on a currently undeveloped portion of the campus immediately west of Vista Del Sol, approximately 100 feet west of the easterly HBFC property line.

Patients would stay onsite temporarily, generally no more than 30 days. No patients would be expected to permanently relocate to Rancho Mirage as a result of the Project.

Table 2.14-6
Existing vs. Proposed Housing

	Existing		Proposed		
Building Name	**Square Feet (approx.)**	**Beds**	**Square Feet (approx.)**	**Beds**	**Notes**
Fisher Hall	12,818	20	---	---	to be demolished
Pocklington Hall	12,894	20	---	---	to be demolished
McCallum Hall	12,988	20	---	---	to be demolished
North Hall	12,994	20	---	---	to be demolished
Ottenstein Hall	14,700	20	14,700	20	existing, not affected by Project
Residential Bldg. #1	---	---	30,935	46	to be built
Residential Bldg. #2	---	---	30,935	46	to be built
Day Treatment Building	---	---	16,349[1]	44	to be built
Total:	**66,394**	**100**	**92,919**	**156**	

[1] Includes treatment space. Does not include 6,399 square feet of administrative space.

The Project would generate new temporary construction jobs and an estimated 20.8 longer-term jobs[8] in fields such as health care, administration, and support services. It could attract new workers from outside the region to permanently relocate to Rancho Mirage and/or surrounding communities. However, it is anticipated that most new jobs would be filled by existing local residents, and impacts on the housing supply, if any, would be very limited.

The proposed new access driveway between HBFC and Vista Del Sol would serve as an additional entry/exit for the campus. It would connect to an existing road (Vista Del Sol) and be approximately 24 to 30 feet wide. It would not alter surrounding land use designations or result in the expansion of utility infrastructure and, as such, would not induce population growth.

Project-related impacts on population growth would be less than significant.

b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

No Impact. The Project would result in the demolition of 4 existing onsite residential treatment buildings and replacement with 3 new buildings that serve the same purpose, increase square footage, and increase patient capacity. The Project would not displace existing people or housing such that replacement housing would be required elsewhere.

8 Ibid.

Environmental Justice

As discussed in Sections 2.15.4 and 2.15.5, there are no disadvantaged communities on the Project site or in the Project vicinity or City of Rancho Mirage. Therefore, the Project would have no impact on disadvantaged communities.

Proposed physical changes would update aging drug and alcohol treatment and related facilities, improve campus access and grounds, security, increase patient capacity, and create new jobs. In this regard, the proposed Project is expected to have a net positive socio-economic benefit on the community. No adverse social or economic impacts are anticipated, including any that would disproportionately affect low-income or minority communities.

2.14.7 Mitigation Measures

None required.

2.14.8 Significance After Mitigation

Impacts would be less than significant, and no significant or unavoidable impacts would occur.

2.14.9 Cumulative Impacts

The Project would have a less than significant cumulative impact on regional population and housing. Proposed improvements would increase patient capacity, but patients would stay temporarily, for a relatively short duration (30 days), and would not permanently affect the regional population or housing stock. The Project would create new jobs that could attract a limited number of new residents to the City and surrounding communities and increase the demand for housing. However, it is anticipated that most jobs would be filled by current residents and, given the limited size and scope of the Project, the number of employees moving from outside the region would be limited and would not affect the local or regional housing market. When considered in conjunction with other existing, proposed, and approved development projects in the area, the incremental impact of the Project would be less than significant.

The Project would have no cumulative impact on environmental justice because no disadvantaged communities are located in the Project vicinity or adjacent cities; the nearest is more than 9 miles away.

2.15 Public Services

2.15.1 Introduction

The following section describes the existing public services in the Project vicinity and analyzes the potential impacts associated with the HBFC PDP Project. A variety of local and regional data and information, ranging from research and analysis conducted for the Project site, to regional-scale planning and environmental documents, have been used in researching and analyzing the Project and its potential effects on public services.

2.15.2 Thresholds of Significance

Potential impacts to public services are analyzed using the thresholds of significance provided in Appendix G of the CEQA Guidelines. Appendix G uses the following questions to evaluate the Project's potential impacts.

Would the project:

a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

- Fire Protection?
- Police Protection?
- Schools?
- Parks?
- Other Public Facilities?

2.15.3 Regulatory Framework

Federal

There are no federal regulations governing public services that apply to the proposed HBFC PDP Project.

State

There are no state regulations governing public services that apply to the proposed HBFC PDP Project.

Regional and Local

Rancho Mirage General Plan
The City of Rancho Mirage General Plan (2017) provides the following public services policies that are applicable to the Project:

Policy 6.1 Review all new and improved developments for their impact on safety and the provision of police and fire protection services.

Policy 7.2 Cooperate in the process to secure school impact fees from developers in accordance with state law and strive to reduce overcrowding and improve the educational quality of the public school system.

Program 2.2B Require all new development to pay Development Impact Fees in order to provide a funding mechanism for parkland.

2.15.4 Environmental Setting

Fire protection, first response, emergency medical services, and natural disaster preparedness services in the City are provided by the Riverside County Fire Department (RCFD) under contract to the California Department of Forestry and Fire Protection (Cal Fire). The City is a member of the Cove Communities Services Commission, which includes the cities of Palm Desert, Rancho Mirage, and Indian Wells.

Police protection in Rancho Mirage is provided on a service contract basis by the Riverside County Sheriff's Department that operates out of the Palm Desert Station. The current agreement went into effect on July 1, 2016 and is a five-year contract that will expire on June 30, 2021.

Two school districts, Desert Sands Unified School District (DSUSD) and Palm Springs Unified School District (PSUSD), serve the City. One private school, the Palm Valley School, also provides K-12 education in the City.

2.15.5 Existing Conditions

Fire Protection

The City of Rancho Mirage contracts with Riverside County Fire Department (RCFD) for fire protection services. RCFD is one of the largest regional fire service organizations in the State of California. The RCFD operates 96 fire stations in 19 bureaus.[1] Services provided by the RCFD include fire suppression, emergency medical, rescue, and fire prevention services. The RCFD is staffed with approximately 952 career and 1,100 volunteer personnel, and currently serves approximately two million residents in an area of 7,004 square miles. The RCFD service area consists of all unincorporated areas in Riverside County, 20 contract cities, and one Community Service District (CSD). Under contract with the California Department of Forestry and Fire Protection (CAL FIRE), the RCFD is the Operational Area Coordinator for the California Fire and Rescue Mutual Aid System for all fire service jurisdictions in the County of Riverside. As such, RCFD has also been given the authority to enter into several automatic aid agreements with city jurisdictions, as well as with adjacent National Forests.

Riverside County Fire Station No. 69 at 71751 Gerald Ford Drive is approximately 1.7 miles northwest of the Project site. Equipment at this station consists of one medic engine (fire truck) and one medic unit (ambulance). A total of three firefighters and two firefighter/paramedics are on duty at this station at all times. The other station located within the City, Station No. 50, is approximately 1.7 miles southwest of the Project site. Station No. 50 is equipped with one medic engine and one medic unit. The station is staffed with two firefighters and one firefighter/paramedic at all times. In the event of a major incident, resources from other nearby stations can be used to assist fire personnel in Rancho Mirage.

Health Services

The RCFD also provides paramedic services to the City of Rancho Mirage.[2] There are three valley hospitals that can provide care and personnel in the event of an emergency in the valley, including within the City of Rancho Mirage. They include:

Desert Regional Medical Center
1150 N Indian Canyon Drive
Palm Springs, CA 92262
Approximately 9.68 miles northwest of the Project site.

1 Riverside County Fire Department Annual Report 2018.
2 Rancho Mirage General Plan 2017 – Page 104.

Eisenhower Medical Center
39000 Bob Hope Drive
Rancho Mirage, CA 92270
Adjacent to the Project site.

John F. Kennedy Memorial Hospital
47111 Monroe St
Indio, CA 92201
Approximately 10.06 miles southeast of the Project site.

Police Protection

The City of Rancho Mirage contracts with the Riverside County Sheriff's Department (RCSD) for police protection services. RCSD provides several law enforcement services, such as general community policing, as well as the operation and maintenance of several correctional facilities, to areas under its jurisdiction.

The nearest police station to the Project site is the Palm Desert Police Station on Gerald Ford Drive, approximately 2 miles to the northeast. Staffing consists of 80 sworn officers that include 36 dedicated to the patrol division with the remaining to special assignments such as the Traffic Division, Special Enforcement Team, and K-9 Officer. In 2016, eight dedicated police personnel served Rancho Mirage, and another 15 non-dedicated deputies aided in patrol, providing about one officer per every 786 residents in the City. The current average response time by priority is as follows:[3]

Priority 1 calls < 5 minutes
Priority 2 calls < 19 minutes
Priority 3 calls < 35 minutes

Schools

Two school districts, Desert Sands Unified School District (DSUSD) and Palm Springs Unified School District (PSUSD), serve the City of Rancho Mirage. The Project site is within DSUSD's jurisdiction.[4] DSUSD consists of 18 elementary schools, one charter elementary school, six middle schools, one charter middle school, four comprehensive high schools, two continuation high schools, one alternative education school, and one preschool.[5] The nearest school to the Project site is Rancho Mirage Elementary School, located approximately 1.97 miles southeast of the Project site.

Several undergraduate and graduate schools are located in the adjacent City of Palm Desert, including College of the Desert (COD), University of California-Riverside/Palm Desert (UCR Palm Desert), and California State University - San Bernardino Palm Desert Campus (CSUSB Palm Desert). COD is a community college that opened in September 1962. The COD main campus is located on Monterey Avenue in Palm Desert; it offers a two-year college programs and has an average enrollment of 10,000 students per semester. COD offers a wide range of vocational and technical programs, including nursing and health sciences, digital design and production, turf grass management and ornamental horticulture, advanced transportation technologies, and a full range of administration of justice courses.

3 Provided by Lieutenant Robert Castro at Riverside County Sheriff's Department in August 2018.
4 Desert Sands Unified School District Boundary Map; https://www.dsusd.us/sites/default/files/DSUSD_SchoolFacilities.pdf, accessed January 2019.
5 Desert Sands Unified School District; https://www.dsusd.us, accessed January 2019.

UCR Palm Desert is an extension of University of California-Riverside (UCR); it opened in 2005. UCR Palm Desert's campus is located on Cook Street; it offers a number of bachelor's and graduate programs. CSUSB Palm Desert is an extension of California State University - San Bernardino; it opened in 2012. CSUSB Palm Desert is located on Cook Street just south of Interstate-10. The CSUSB Palm Desert Campus offers several academic programs, including bachelor's and graduate degree programs.

Parks

The City of Rancho Mirage has a total of 55 acres of park lands and an additional 29 acres dedicated for future parks.[6] The nearest public park to the Project site is Rancho Mirage Community Park, located approximately 1.26 miles southwest of the site.

Other Public Facilities

Other public facilities in the City include City Hall, the public library, the Chamber of Commerce, and medical/emergency facilities.

Facility	Location	Distance to the Project Site
City Hall	69825 Highway 111	2.68 miles
Rancho Mirage Public Library	71-100 Highway 111	1.43 miles
Rancho Mirage Chamber of Commerce	71905 Highway 111	1.75 miles
Eisenhower Medical Center	34130 Gateway Drive	Adjacent

2.15.6 Project Impacts

Would the Project:

a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

- ***Fire Protection?***
- ***Police Protection?***
- ***Schools?***
- ***Parks?***
- ***Other Public Facilities?***

Fire Protection

Construction of the proposed Project will result in a marginal potential increase in fire and medical response demand associated with construction activities and equipment. Potential ignition sources during construction-related activities could include chain saws, woodchippers, grinders, torches, earth-moving equipment, and other vehicles that could create sparks, be a source of heat, or leak flammable materials, that would increase the possibility of fire. However, the Fire Code requires that water connections be available prior to the initiation of construction, thereby assuring that, water will be available for extinguishment in a fire event.

[6] City of Rancho Mirage General Plan 2017 – Page 11.

In order to estimate the potential demand for fire protection services to the Project at buildout, data was collected from the Fire Department on calls made to the Betty Ford Center in 2018 and 2019.[7] There were a total of 107 calls during the two calendar years, of which 24 were fire-related and the remainder were primarily medical-related. Given the current 100-bed capacity at HBFC, on average there were 0.54 calls for service per room per year based on the 2018-2019 data. This factor was used to estimate the number of calls that the Project could generate at buildout. Based on this factor, the Project will result in approximately 85 calls for fire services per year, which is an additional 31 calls compared to the current call volume. The Fire Department responded to a total of 5,190 calls within the City of Rancho Mirage in 2018,[8] and the Project will result in an estimated 0.6% increase in the number of calls. Therefore, the Project is not expected to require the construction of new or physically altered fire facilities that might result in physical environmental impacts in order to maintain acceptable service performance objectives, and Project-related impacts would be less than significant.

The HBFC opened in 1982 and has since taken primary and secondary/emergency access through the EMC campus. The proposed Project will result in a new primary access driveway onto the HBFC campus from the adjoining Vista Del Sol. Bounding the subject property on the east, this roadway extends south to a signalized intersection at Country Club Drive, and north to stop-controlled intersection at Frank Sinatra Drive. A new access drive of approximately 24-30 feet wide is planned, which will proceed west into the campus and connect to the existing on-site circulation network. The driveway is expected to shorten emergency response times to incidents onsite.

Fire lanes, turning radius, and backup space around buildings will require approval of the Fire Marshall to assure adequate access for emergency and fire equipment vehicles. Pavements are required to support loads created by emergency vehicle traffic. Standpipe and fire suppression system connections are required for architectural design elements and in locations accessible to fire equipment.

The Project would incorporate fire safety features in accordance with applicable RCFD fire safety codes and City regulations for construction, access, fire flows, and fire hydrants. These fire safety features include, but are not limited to, ample roads, adequate building spacing, use of fire-resistant building materials, and adequate vegetative clearance around structures. In addition, all buildings within the Project area will be required to be equipped with automated sprinkler systems, thereby reducing potential for major structural fire at the Project site.

The proposed Project would be required to pay the fire facilities and equipment development impact fees, which is charged on new development. Funding provided by the Project would result in capital for future fire facilities. Project-related impacts to fire protection services and facilities would be less than significant.

Police Protection

Construction of the proposed Project will result in a potential increase in the need for security to prevent theft or vandalism of construction activities and equipment. However, this potential impact can be minimized through compliance with standard safety measures, such as fencing and locking excavation, vehicle staging, and storage areas at the end of each workday, providing adequate nighttime lighting, minimizing "dead zones," and providing professional security personnel. With implementation of these measures, impacts associated with public safety during construction of the proposed Project will be reduced to less than significant levels.

[7] "Incident Report by Location and Final Type, 1/1/2018 to 12/31/2019." CAL FIRE/Riverside County Fire Department Records & Investigations.

[8] Riverside County Fire Department Annual Report 2018.

At buildout, the proposed Project would result in an additional 56 patients and 21 employees onsite if fully occupied, thereby generating a potential increase in the level of police protection service calls from the Project site. Implementation of the following standards and measures will help reduce the potential increase in demand for police protection services.

i) Design and development of individual Project components should incorporate elements of defensive design that enhance safety for patients and employees, while optimizing site surveillance by on-site security personnel. The City Planning Department and Riverside County Sheriff's Department will evaluate Project development plans from a "defensible space" perspective, to include review of internal circulation, emergency access, and street/building names and numbering systems.

ii) Final project plans and maps should incorporate design refinements which limit unauthorized site access to the greatest extent practical. The placement of walls, fences, landscape deterrents, and surveillance equipment should optimize opportunities to frustrate and preclude unauthorized access.

iii) Security and emergency outdoor lighting and other security measures should be incorporated into the design of the development and individual structures to preclude unauthorized access and thereby reduce the need for police response.

In order to estimate the potential demand for police protection services to the Project at buildout, a request for data about service calls made to the Betty Ford Center in 2018 and 2019 was submitted to the Riverside County Sheriff's Department.[9] The Eisenhower Medical Center and Betty Ford Center share a street address, and the Sheriff's Department combines data about the number and nature of service calls at the two facilities into one data set; calls specific to HBFC are not distinguishable from calls to EMC. Due to the different natures of EMC (acute-care hospital) and HBFC (addiction treatment center), it would not be reasonable to compare or generalize the demand for police protection services to HBFC based on the data received. For analysis purposes, the Project demand for police protection services would be comparable to the demand for fire protection services discussed in the section above, especially in terms of calls and responses. The Project is not expected to require new or physically altered police facilities in order to maintain acceptable service ratios, response times, or other performance objectives with implementation of the aforementioned standard requirements and measures. Impacts would be less than significant.

Schools

According to the DSUSD, the District has school capacity to serve approximately 28,503 students.[10] Elementary school facilities are sufficient to serve 12,582 students in kindergarten through fifth grade; middle school facilities are sufficient to serve 6,666 students in sixth through eighth grade; and high school facilities are sufficient to serve 9,255 students in ninth through twelfth grade. Currently, approximately 28,610 students are enrolled into the DSUSD system, leaving excess capacity only at the elementary school level. Furthermore, approximately 24,089 new dwelling units are anticipated to be constructed within the DSUSD jurisdictional boundaries by the year 2035.

Buildout of the Project will result in an estimated 21 additional employees, which are expected to be primarily local residents. To provide a conservative analysis, it is assumed all 21 Project-related employees will move to Rancho Mirage from outside communities and become new City residents. Potential student generation is estimated to be a maximum of nine students (see Table 2.15-1 below, assuming 21 residential units). The potential student increase represents less than 0.1% of DSUSD's current student body.

[9] Personal communication with Jennifer Benoit, Community Service Officer, Rancho Mirage Crime Prevention Division, February 4, 2020.

[10] Desert Sands Unified School District - Fee Justification Study for New Residential and Commercial/Industrial Development, May 2018.

The Project proponent will be required to pay the mandated school mitigation fees imposed by the State for commercial construction. Based on the developer fees established by DSUSD, the Project would be required to pay $3.79 per square feet of residential development. Based on Section §65996 of the California Government Code, the payment of such fees is deemed to fully mitigate the impacts of new development on school services. Therefore, with payment of these required developer fees, Project impacts to school services would be less than significant.

Table 2.15-1
Estimated Student Generation

School Type	Generation Rate (per residential unit)	Number of New Employees at Project Buildout	Project's Student Generation
Elementary School	0.1682	21	4
Middle School	0.0922	21	2
High School	0.1275	21	3
Total:			9

Source: Desert Sands Unified School District - Fee Justification Study for New Residential and Commercial/Industrial Development (May 2018) and Project materials.

Parks

Buildout of the Project will result in an estimated 21 additional employees, which are expected to be primarily local residents. To provide a conservative analysis, it is assumed all 21 Project-related employees will move to Rancho Mirage from outside communities and become new City residents. Project employees can be expected to increase the use of local and regional parks; however, the number of employees is limited (0.1% of the City's 2019 population[11]), and no new or altered facilities would be required to serve them. Project patients will be able to use an onsite swimming pool and generous landscaped areas with a pond, and additional features are proposed to enhance onsite amenities. The Project's landscaping design, in conjunction with the City's current parks and recreational facilities and the collection of park improvements development impact fees that support the City's park improvements fund (as required by Rancho Mirage Municipal Code 3.29.140), would be adequate to accommodate the Project's demand for parks and recreational services. Therefore, Project impacts to parks would be less than significant.

Other Public Facilities

The additional patients and employees at buildout of the Project are expected to spend the most time on campus. However, some may attend the local library or other public facilities, and few may require medical services at other local facilities. However, such visits are expected to be minimal and are not expected to require new or expanded facilities that could result in adverse environmental impacts. Project-related impacts to other public facilities will be less than significant.

2.15.7 Mitigation Measures

Impacts will be less than significant. No mitigation measures are required.

2.15.8 Significance After Mitigation

Project impacts to fire and police services, schools, and other public facilities would be less than significant. No mitigation is required.

[11] The population of Rancho Mirage was 18,489 in 2019 per Report E-5: City/County Population and Housing Estimates, January 1, 2019, California Department of Finance.

2.15.9 Cumulative Impacts

Police Protection

Implementation of the proposed Project in conjunction with other development projects in the area would increase the demand for police services. Over time, increases in population in the City have the potential to increase calls for police protection services. The Project alone would result in minimal increases in population and building square footage, and impacts would be reduced by incorporating safety features and strategies into site planning and coordinating Project plans with the Police Department. The proposed Project's contribution would not be cumulatively considerable.

Fire Protection

Implementation of the proposed Project in conjunction with the other related projects in the area would increase the demand for fire protection services over time. The Project alone would result in minimal increases in population and building square footage; as discussed above, impacts would be less than significant with payment of fire facilities and equipment development impact fees. The proposed Project's contribution would not be cumulatively considerable.

Schools

The proposed Project, in combination with other development projects in the Project vicinity, is expected to result in a cumulative increase in the demand for school services. As discussed above, as of 2018, the DSUSD is over its capacity for middle schools and high schools. The DSUSD has determined that approximately 4.49 additional elementary schools, 1.96 middle schools, and 1.24 high schools will need to be constructed to provide adequate facilities in the future. The estimated costs of these school facilities, excluding interim housing requirements, is over $450 million dollars.[12] Payment of school impact fees will help the DSUSD expand its facilities as needed. The proposed Project will generate a maximum of nine new students, if any, and its contribution to school impacts would not be cumulatively considerable.

Other Public Facilities

The proposed Project, in combination with other development projects in the Project vicinity, would be expected to increase the use of other public facilities in the Project area. Although the proposed Project would contribute to the cumulative demand for other public facilities, its contribution would be minimal because it would generate minimal permanent population, if any. The Project's cumulative impact would be less than significant.

[12] Desert Sands Unified School District - Fee Justification Study for New Residential and Commercial/Industrial Development (May 2018) – Page iii-iv.

2.16 Transportation and Traffic

2.16.1 Introduction

This section of the EIR describes existing transportation conditions in the Project area and analyzes potential Project-related impacts on circulation, traffic, and emergency access. The analysis is based, in part, on a wide range of data and information, including research and analysis conducted for the Project and other developments in the vicinity, as well as regional-scale planning and environmental documents. The Project-specific Traffic Impact Analysis, prepared by Urban Crossroads[1] in February 2020 is included in Appendix H.

2.16.2 Thresholds of Significance

According to CEQA Guidelines Appendix G, the Project would have a significant effect on transportation if it would:

a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities.

b) Conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b).

c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).

d) Result in inadequate emergency access.

2.16.3 Regulatory Framework

Federal

No federal regulations associated with transportation are applicable to the proposed Project.

State

Highways Jurisdiction
The California Department of Transportation (Caltrans) has jurisdiction over state highway facilities, including freeway segments, signalized intersections on state highways, and on- and off-ramp intersections with local roadways.

Complete Streets Act
Assembly Bill (AB) 1358 (2008) requires cities and counties to include complete streets policies as part of their general plans. "Complete streets" are transportation facilities that are planned, designed, operated, and maintained to provide safe and convenient mobility for all users, including bicyclists, pedestrians, transit riders, persons with disabilities, seniors, movers of commercial goods, and motorists, appropriate to the function and context of the facility. Complete streets are intended to decrease the number of vehicle trips traveled, reduce associated air pollutants and greenhouse gas emissions, improve community livability, and improve public health and safety.

[1] "Hazelden Betty Ford Center Traffic Impact Analysis City of Rancho Mirage", prepared by Urban Crossroads, Inc., February 4, 2020

Regional and Local

CVAG Active Transportation Plan

The Coachella Valley Association of Governments (CVAG) Active Transportation Plan[2] (2016) establishes a coordinated, long-range plan for developing regional bicycle, pedestrian, and neighborhood electric vehicle (NEV) facilities in the Coachella Valley.

CVAG Neighborhood Electric Vehicle Plan

CVAG's Neighborhood Electric Vehicle (NEV) Plan (2014) was developed in conjunction with the planning of CV Link (see Section 2.18.4). It provides a potential network concept for future NEV routes in the Coachella Valley.

Transportation Uniform Mitigation Fee Program

The Transportation Uniform Mitigation Fee (TUMF) program is administered by the Coachella Valley Association of Governments (CVAG) to generate additional funds required for improvements to the regional transportation system. The TUMF boundary covers the entire Coachella Valley region, including the City of Rancho Mirage. TUMF development impact fees are collected by participating jurisdictions from new residential and non-residential development at the building or occupancy permit stage. Collected fees are transferred to CVAG for allocation to the Regional Arterial Program.

Transportation Project Prioritization Study

The Coachella Valley Association of Governments (CVAG) is responsible for identifying and prioritizing transportation projects in the Coachella Valley. The 2016 Transportation Prioritization Study (TPPS) ranks regionally significant roadway segments to determine which have the greatest need for improvement and where funding should be directed. A future I-10 freeway interchange at the extension of Da Vall Drive was been identified as a regional transportation improvement in the TPPS.

Regional Transportation Plan/Sustainable Communities Strategy

The Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) identifies policies, projects, and programs needed over a 20+ year period to maintain, manage, and improve the transportation systems in the Southern California Association of Governments (SCAG) region. The RTP/SCS is updated every four years. The 2016-2040 RTP/SCS includes regional growth forecasts, a strategic plan, and a sustainable communities strategy to improve the transportation system to meet the demands of a growing population. It promotes active transportation improvements, such as a regional greenway network, regional bikeway network, bike share services, complete sidewalks and bikeways networks, and neighborhood mobility areas.[3]

Congestion Management Plan (CMP)

The Riverside County Congestion Management Plan (CMP) was prepared by the Riverside County Transportation Commission (RCTC) in 2011 to improve the county's transportation system. The CMP links land use, transportation, and air quality in the county to prompt reasonable growth management programs, alleviate traffic congestion, and improve air quality. Local agencies work with the County to meet CMP goals.

The CMP establishes minimum traffic level-of-service (LOS) standards for a system of highways and roadways, including state highways and principal arterials, designated by RCTC. Transportation Systems Management (TSM) and Transportation Demand Management (TDM) strategies are also adopted to improve LOS. In the Project vicinity, Monterey Avenue is designated as a CMP roadway.

2 "Coachella Valley Association of Governments Active Transportation Plan," Michael Baker International, 2016.
3 2016-2040 Regional Transportation Plan/ Sustainable Communities Strategy, Southern California Association of Governments, 2016.

Rancho Mirage General Plan

The Rancho Mirage General Plan sets forth future transportation goals, policies, and programs. Policies from the Circulation Element that are relevant to the proposed Project include the following:

Goal CIR 1 A safe, efficient, attractive, and economical circulation network meeting current and future demands in a manner consistent with the resort residential character of the community.

Policy CIR 1.1 Rancho Mirage's street systems shall be designated and constructed to maximize mobility, minimize congestion, and assure that all intersections and street segments operate at "LOS D" or better during the peak hours.

Policy CIR 1.2 A detailed traffic analysis shall be required for development proposals or other activities that might potentially require roadway improvements above and beyond those evaluated in the Circulation Element and General Plan EIR and EIR Addendum.

Policy CIR 1.9 Circulation and access for undeveloped parcels shall be coordinated with surrounding properties.

2.16.4 Environmental Setting

Roadway Network

Regional connectivity in the Coachella Valley is provided by Interstate 10 (I-10), Highway 111, and State Routes 62 and 74. I-10 extends through the valley in a northwest-southeasterly trending direction and connects the region to western Riverside County and the Los Angeles metropolitan area to the west, and desert communities and Arizona to the east. Highway 111 is south of and roughly parallel to I-10. Highway 111 accommodates local and regional traffic through one of the City's principal commercial corridors and connects to other Coachella Valley communities, from Palm Springs on the west to the Salton Sea and Imperial County on the east.

Arterials in the Coachella Valley are generally developed in a north-south/east-west grid pattern. The principal arterials serving Rancho Mirage include Da Vall Drive, Bob Hope Drive, Monterey Avenue, Ramon Road, Dinah Shore Drive, Gerald Ford Drive, Frank Sinatra Drive, and Country Club Drive. The City is connected to I-10 via an interchange at Bob Hope Drive.

Non-Motorized Circulation

Connections between roadways and transit facilities are provided through a network of sidewalks and crosswalks. Bicycle and golf cart facilities vary by jurisdiction and include a combination of separated pathways, on-road bike lanes, and shared road facilities.

Truck Routes

Interstate-10 and Highway 111 are part of the highway truck route system. In Rancho Mirage, designated truck routes include Ramon Road, Dinah Shore Drive, Frank Sinatra Drive (east of Bob Hope Drive), Country Club Drive (east of Bob Hope Drive), Highway 111, Monterey Avenue, and Bob Hope Drive (between I-10 and Gerald Ford Drive). Time restricted truck routes include Gerald Ford Drive (west of Bob Hope Drive) and Bob Hope Drive (between Gerald Ford Drive and Highway 111).[4]

[4] Exhibit 9, Rancho Mirage General Plan 2017 Update.

Public Transit
Public transportation in the Coachella Valley consists of transit bus service operated by the SunLine Transit Agency. Three bus routes serve the City of Rancho Mirage: 1) Line 111 extends northwest/southeast along Highway 111, 2) Line 32 generally extends north/south along Bob Hope Drive, and 3) Commuter Link 220 extends along I-10 and Monterey Avenue.[5] SunLine also operates paratransit service, known as SunDial, to supplement fixed route service and to meet the requirements of the Americans with Disabilities Act (ADA).

Airports
The Coachella Valley is served by three airports. The Palm Springs International Airport is the largest and primary passenger air transportation link for the region. It is 7± miles northwest of the subject property and classified in the National Plan of Integrated Airport Systems (NPIAS) as a long-haul commercial service airport. It also handles air freight and provides heliport access that is largely limited to medical evacuation flights between the Desert Regional Medical Center and Eisenhower Medical Center.

The Bermuda Dunes Airport is a privately owned, public use airport approximately 7 miles east of the subject property. It accommodates corporate and private aircraft and is the designated airport for medivac flights for John F. Kennedy Hospital and Eisenhower Medical Center.

The Jacqueline Cochran Regional Airport, in the unincorporated community of Thermal, is 16± miles southeast of the subject property and caters to business class and private aviation aircraft.

Railroads
Rail lines operated by Union Pacific Railroad (UPRR) cross through the Coachella Valley in a northwest-southeast trending direction, roughly parallel to and immediately south of Interstate-10. They accommodate freight traffic as well as Amtrak's Sunset Limited that provides passenger service between Los Angeles and New Orleans. Amtrak operates an open-air train station in Palm Springs for the Sunset Limited. The rail lines are approximately 3½ miles north of the Project site, and the nearest train station in Palm Springs is 12± miles to the northwest.

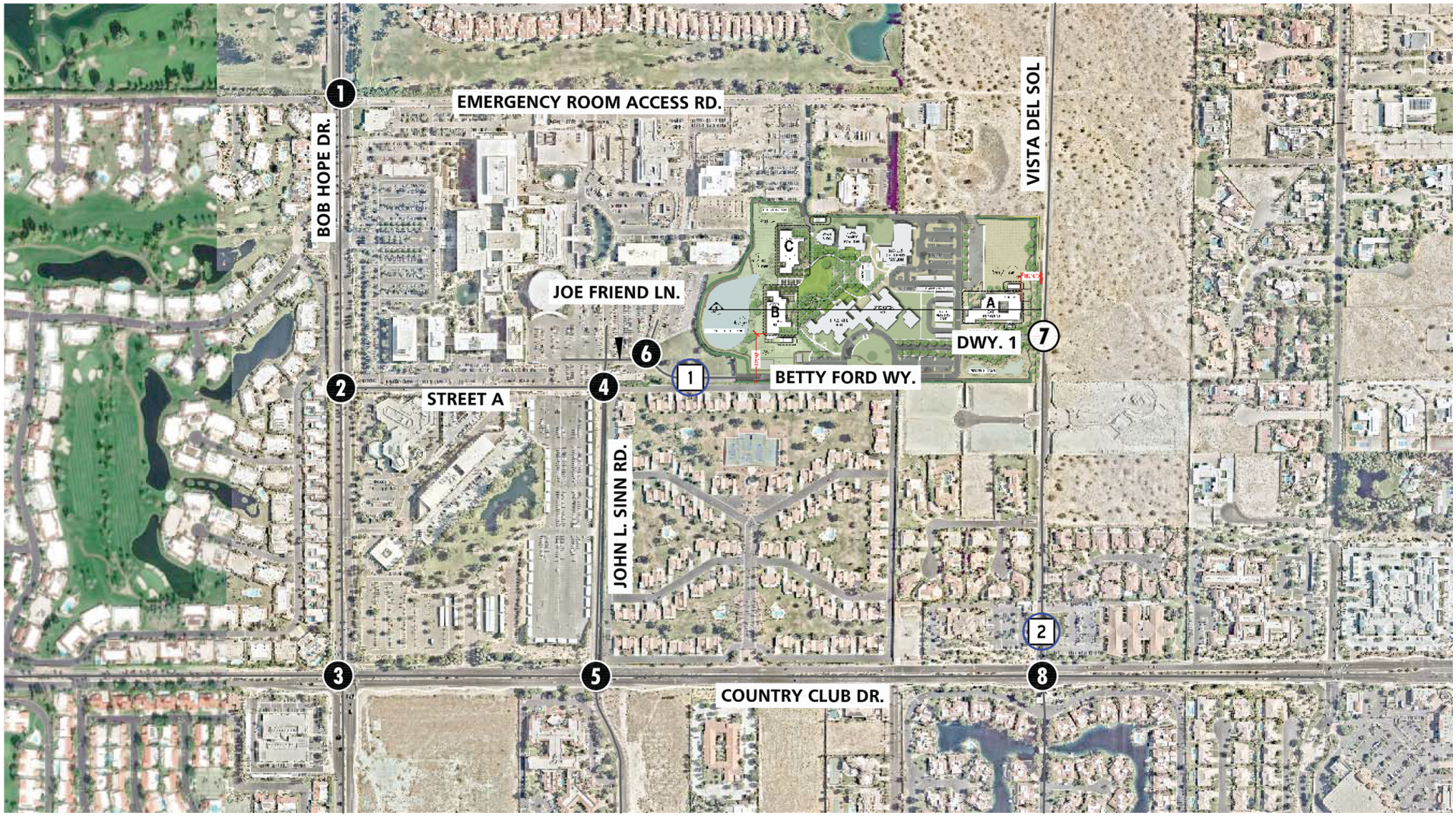
2.16.5 Existing Conditions

Study Locations
Existing conditions in the Project study area were analyzed in the Project-specific Traffic Impact Analysis (Appendix H of this DEIR). The boundaries of the study area were determined in coordination with the City of Rancho Mirage. Data collection included two (2) 24-hour roadway count locations and eight (8) intersection analysis locations, as shown on Exhibit 2.16-1.

Roadways and Traffic Volumes
As shown on Exhibit 2.16-1, the principal arterials in the Project planning area are Country Club Drive and Bob Hope Drive.

- *Country Club Drive* is ±¼ -mile south of the Project site. It is an east-west arterial that extends from Highway 111 to Monterey Avenue in Rancho Mirage, and ultimately extends farther east to Indio. East of Bob Hope Drive, it is designated as a Minor Arterial in the Rancho Mirage General Plan and is constructed to its ultimate 100-foot right-of-way with two through travel lanes in each direction and a raised median. West of Bob Hope Drive, it is designated as a Major Collector with a 100-foot right-of-way.

[5] https://www.sunline.org, accessed December 2019.



LEGEND:

0 = EXISTING INTERSECTION ANALYSIS AND COUNT LOCATION

(0) = FUTURE INTERSECTION ANALYSIS LOCATION

00 = 24-HOUR ROADWAY SEGMENT COUNT LOCATION

N

02.13.20

Source: Urban Crossroads, 2020

TERRA NOVA®
PLANNING & RESEARCH, INC.

Hazelden Betty Ford Center PDP EIR
Study Area Intersections and Roadway Count Locations
Rancho Mirage, California

Hazelden Betty Ford Foundation

Exhibit
2.16-1

- *Bob Hope Drive*, located ±¼ -mile west of the Project site, is a north-south arterial that extends from Varner Road and Interstate-10 on the north to Highway 111 on the south. South of Frank Sinatra Drive, it is designated as a Minor Arterial in the General Plan and master planned for a 100-foot right-of-way with two through lanes in each direction and a raised median.

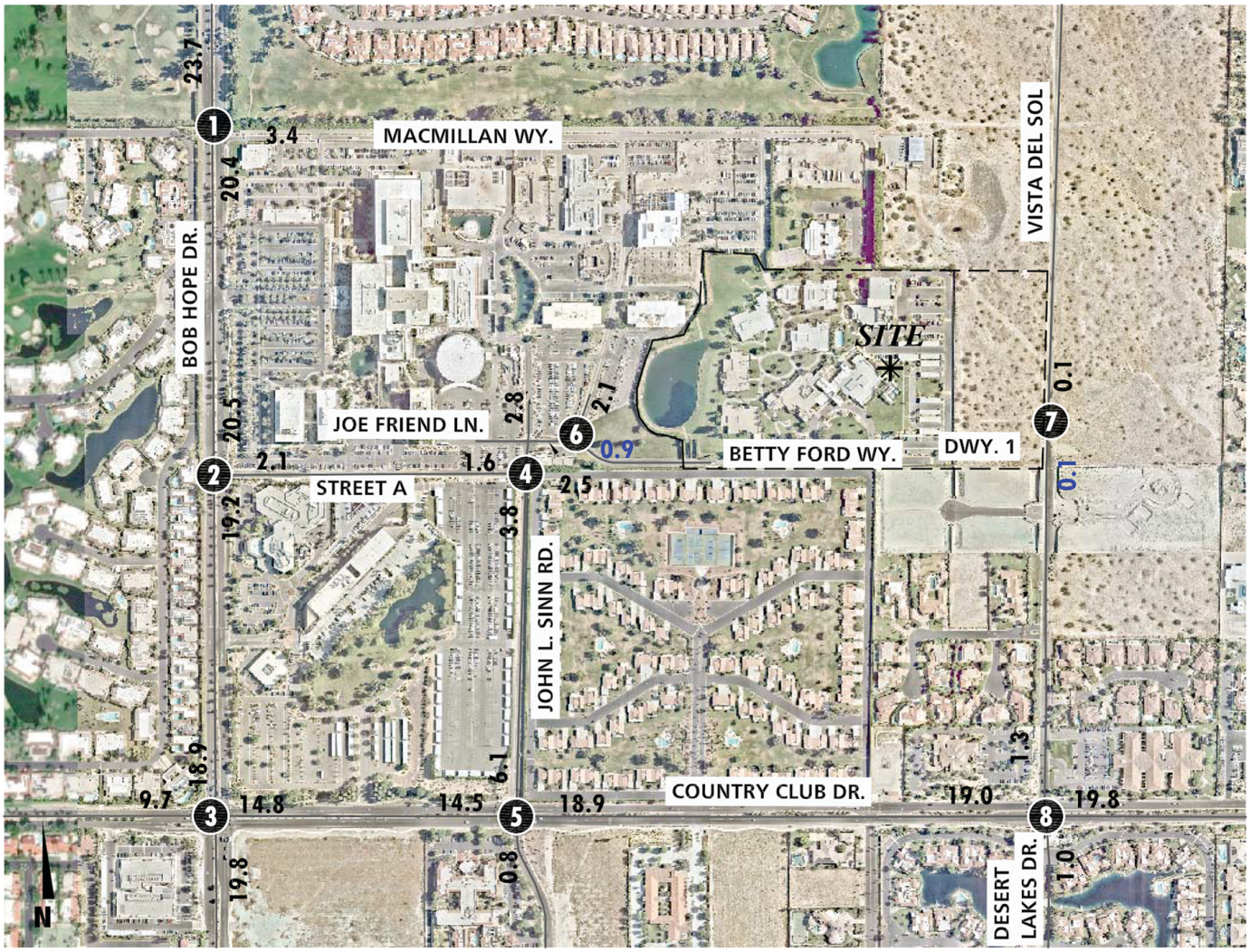
Other key roadways in the Project area include:

- *Vista Del Sol*, immediately east of HBFC, is a two-lane north-south Local Street that extends from Frank Sinatra Drive on the north to Country Club Drive on the south. The southern portion of the road has been improved to its ultimate 60-foot right-of-way with curbs and gutters, but the remainder is largely unimproved. The subject property fronts on but currently has no access to this roadway.

- *John L. Sinn Road* is a two-lane north-south road that intersects with Country Club Drive and provides direct access to the EMC campus. It extends from Palm Crest Drive on the south to the southern portion of the EMC campus.

- Internal access within the EMC and HBFC campus is provided by: 1) *Emergency Room Access Road* (also known as *MacMillan Way*) on the north, 2) *Betty Ford Way* on the south, 3) *Street A* on the south, and 4) *Joe Friend Lane* on the south.

Existing weekday average daily traffic (ADT) volumes on roadways in the study area are shown on Exhibit 2.16-2. They are based on estimated and actual traffic counts collected in the Project area in December 2019.



1 Bob Hope Dr. & MacMillan Wy.

998(663) → 244(39) → 87(241)
308(1047) ← 35(3)

2 Bob Hope Dr. & Street A

762(656) → 174(28) → 36(113) ← 11(20)
371(921) ← 51(13)

3 Bob Hope Dr. & Country Club Dr.

43(41) → 519(523) → 109(180) → 170(171) ← 238(261) ← 205(189)
65(69) → 187(270) → 98(84) → 53(87) ← 330(605) ← 101(170)

4 John L. Sinn Dr. & Street A

14(14) → 67(133)
18(14) → 17(78) → 76(27) ← 225(77)

5 John L. Sinn Dr. & Country Club Dr.

21(57) → 0(8) → 85(371) → 379(65) ← 658(526) ← 14(11)
44(11) → 327(592) → 16(12) → 3(19) ← 1(1) ← 5(23)

6 Joe Friend Ln. & Betty Ford Wy.

50(119) → 15(2) → 5(16) ← 8(37)
110(35) ← 87(18)

7 Vista Del Sol & Dwy. 1

Future Intersection

8 Vista Del Sol/ Desert Lakes Dr. & Country Club Dr.

12(25) → 1(0) → 20(46) → 43(24) ← 1046(565) ← 20(31)
15(9) → 385(966) → 9(16) → 14(16) ← 0(1) ← 21(25)

LEGEND:

10.0 = ACTUAL (COUNT-BASED) VEHICLES PER DAY (1000'S)
10.0 = ESTIMATED VEHICLES PER DAY (1000'S)
10(10) = AM(PM) PEAK HOUR INTERSECTION VOLUMES

N

02.13.20

Source: Urban Crossroads, 2020

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PLANNING & RESEARCH, INC.

Hazelden Betty Ford Center PDP EIR
Existing (2019) Traffic Volumes
Rancho Mirage, California

Hazelden Betty Ford Foundation

Exhibit
2.16-2

Intersections and Level of Service

Traffic operations of roadway facilities are described in terms of "Level of Service" (LOS). LOS is a qualitative measurement that is typically dependent on the quality of traffic flow at the intersections along a roadway. It is described as a range of alphabetical connotations, "A" through "F," which are used to characterize roadway intersection operating conditions. LOS A represents the best, free flow conditions, and LOS F indicates the worst conditions and system failure.

The Highway Capacity Manual (HCM) uses different methodologies to evaluate LOS, depending on the type of intersection control. For signalized intersections, LOS is directly related to the average control delay per vehicle and is correlated to a LOS designation (Table 2.16-1). For unsignalized intersections, the City of Rancho Mirage requires that the rating is based on the weighted average control delay expressed in seconds per vehicle, per the methodology described in the HCM 6th Edition (Table 2.16-2).

Table 2.16-1
Signalized Intersection LOS Thresholds

Description	Average Control Delay (Seconds), V/C ≤ 1.0	Level of Service, V/C ≤ 1.0	Level of Service, V/C > 1.0
Operations with very low delay occurring with favorable progression and/or short cycle length.	0 to 10.00	A	F
Operations with low delay occurring with good progression and/or short cycle lengths.	10.01 to 20.00	B	F
Operations with average delays resulting from fair progression and/or longer cycle lengths. Individual cycle failures begin to appear.	20.01 to 35.00	C	F
Operations with longer delays due to a combination of unfavorable progression, long cycle lengths, or high V/C ratios. Many vehicles stop and individual cycle failures are noticeable.	35.01 to 55.00	D	F
Operations with high delay values indicating poor progression, long cycle lengths, and high V/C ratios. Individual cycle failures are frequent occurrences. This is considered to be the limit of acceptable delay.	55.01 to 80.00	E	F
Operation with delays unacceptable to most drivers occurring due to over saturation, poor progression, or long cycle lengths.	80.01 and up	F	F

Source: HCM, 6th Edition

Table 2.16-2
Unsignalized Intersection Description of LOS

Description	Average Control Delay Per Vehicle (Seconds)	Level of Service, V/C ≤ 1.0	Level of Service, V/C > 1.0
Little or no delays.	0 to 10.00	A	F
Short traffic delays.	10.01 to 15.00	B	F
Average traffic delays.	15.01 to 25.00	C	F
Long traffic delays.	25.01 to 35.00	D	F
Very long traffic delays.	35.01 to 50.00	E	F
Extreme traffic delays with intersection capacity exceeded.	> 50.00	F	F

Source: HCM, 6th Edition

Goal 1, Policy 1 of the Rancho Mirage General Plan Circulation Element requires all intersections and street segments in the City to operate at LOS D or better during the peak hours.

The findings of the existing intersection operations analysis are shown in Table 2.16-3. Under existing (2019) conditions, all study area intersections operate at an acceptable LOS during the peak hours except for the intersection at Bob Hope Drive & Street A (intersection #2), which is operating at LOS E during the PM peak hour only.

Table 2.16-3
Intersection Analysis for Existing (2019) Conditions

#	Intersection	Traffic Control[2]	Delay[1] (secs.)		Level of Service	
			AM	PM	AM	PM
1	Bob Hope Drive & MacMillan Way/Emerg. Rm. Access Rd.	CSS	9.9	20.7	A	C
2	Bob Hope Drive & Street A	CSS	31.5	**38.7**	D	**E**
3	Bob Hope Drive & Country Club Drive	TS	21.1	22.2	C	C
4	John L. Sinn Road & Street A	CSS	11.5	9.7	B	A
5	John L. Sinn Road & Country Club Drive	TS	13.6	15.6	B	B
6	Joe Friend Lane & Betty Ford Way	CSS	9.9	9.6	A	A
7	Vista Del Sol & Driveway 1	future intersection				
8	Vista Del Sol/Desert Lakes Drive & Country Club Drive	TS	8.6	9.0	A	A

BOLD = LOS does not meet the applicable jurisdictional requirements (i.e., unacceptable LOS).
[1] Per the Highway Capacity Manual (6th Edition), overall average intersection delay and level of service are shown for intersections with a traffic signal or all-way stop control. For intersections with cross street stop control, the delay and level of service for the worst individual movement (or movements sharing a single lane) are shown.
[2] CSS = Cross-street Stop; TS = Traffic Signal
Source: Table 3-1, Hazelden Betty Ford Center Traffic Impact Analysis, City of Rancho Mirage, Urban Crossroads, February 4, 2020.

Two study area intersections currently warrant a traffic signal based on existing peak hour traffic flows:

1) Bob Hope Drive & MacMillan Way/Emergency Room Access Rd. (intersection #1), and
2) Bob Hope Drive & Street A (intersection #2)

Access to the Project Site

Access to the Project site is provided by a circuitous route through the EMC campus, from campus entrances on Bob Hope Drive and John L. Sinn Road, to Betty Ford Way. Wayfinding signs are provided to guide vehicles to the HBFC campus. An additional, gated secondary/emergency access into the EMC campus is located in the northwest portion of the HBFC site just east of the Barbara Sinatra Children's Center.

Truck Routes

Designated truck routes in the Project vicinity include: 1) Country Club Drive between Bob Hope Drive and Monterey Avenue, 2) Frank Sinatra Drive between Bob Hope Drive and Monterey Avenue, 3) Monterey Avenue, 4) Highway 111, and 5) Bob Hope Drive north of Gerald Ford Drive.[6] In addition, Bob Hope Drive between Gerald Ford Drive and Highway 111 is a time-restricted truck route.

[6] Exhibit 9, Rancho Mirage General Plan 2017.

Public Transit

SunLine Transit Agency Route 32 extends along Bob Hope Drive and Country Club Drive in the immediate Project vicinity. Bus stops are located on both sides of Bob Hope Drive at the EMC main entrance, and both sides of Country Club Drive at John L. Sinn Road (see Exhibit 2.16-3). A bus stop is also provided on the north side of Country Club Drive approximately 800 feet east of Vista Del Sol.

Pedestrian Facilities

As shown in Exhibit 2.16-3, sidewalks are located on the east side of Bob Hope Drive, adjacent to and beyond the EMC campus. Sidewalks also extend along both sides of Country Club Drive, except for a ¼ -mile segment on the north side between John L. Sinn Road and Cholla Lane (at the Wilshire Palms neighborhood). A network of sidewalks connects buildings and parking lots on the EMC and HBFC campuses.

Bicycle Facilities

As shown in Exhibit 2.16-3, shared bike lanes are on both sides of Bob Hope Drive and Country Club Drive in the Project vicinity.

Parking

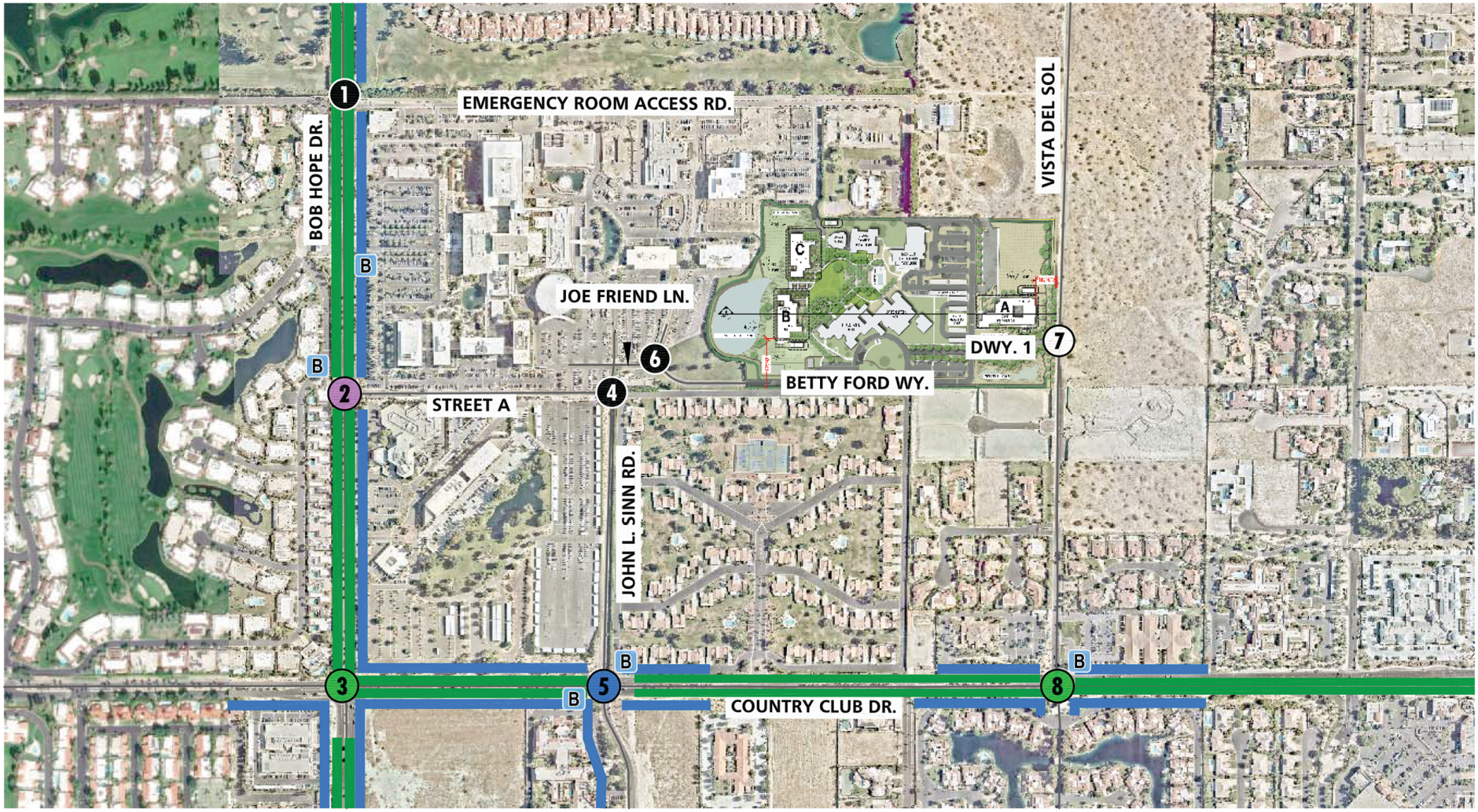
Paved parking lots are located throughout the EMC and HBFC campuses, including the south and east sides of the HBFC campus.

Airports

The Palm Springs International Airport is approximately 7± miles northwest of the Project site, and the Bermuda Dunes Airport is approximately 7 miles to the east.

Railways

The Union Pacific Railroad is ±3 miles north of the Project site.



LEGEND:

- = SIDEWALK
- = BIKE LANE
- B = BUS STOP
- 0 = CROSSWALK ON ALL APPROACHES
- 0 = CROSSWALK ON THREE APPROACHES
- 0 = CROSSWALK ON ONE APPROACH
- (0) = FUTURE INTERSECTION
- 0 = NO CROSSWALK

N

02.13.20

Source: Urban Crossroads, 2020

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Hazelden Betty Ford Center PDP EIR
Existing Pedestrian, Bicycle, and Transit Facilities
Rancho Mirage, California

Hazelden Betty Ford Foundation

Exhibit 2.16-3

2.16.6 Project Impacts

Would the Project:

a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

Less Than Significant Impact With Mitigation.

City LOS Policy

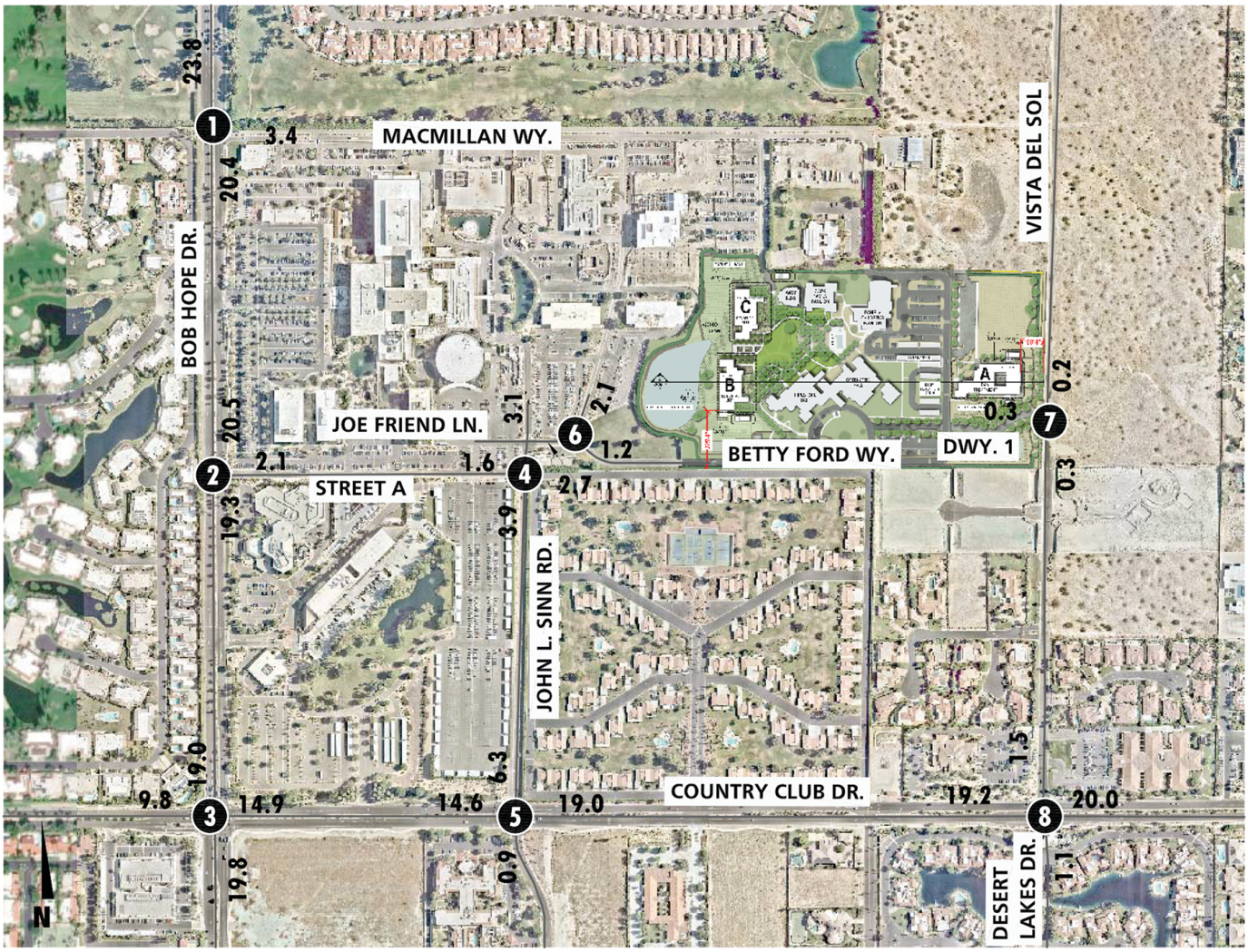
Policy 1 of the Rancho Mirage General Plan Circulation Element requires all intersections and street segments to operate at LOS D or better during the peak AM and PM hours. According to the Traffic Impact Analysis, a deficiency would occur at a study area intersection if the pre-Project condition is at or better than LOS D (i.e., acceptable LOS), and the addition of Project trips would cause the peak hour LOS of the intersection to operate at unacceptable LOS (i.e., LOS E or F). Per the County of Riverside traffic study guidelines, for intersections currently operating at an unacceptable LOS (LOS E or F), a deficiency would occur if the Project contributes 50 or more peak hour trips to pre-Project traffic conditions. The 50 peak hour trip criteria generally represents a minimum number of trips at which a typical intersection would have the potential to be substantively impacted by a given development proposal.

Near-term and long-term Project traffic forecasts were analyzed in the Traffic Impact Analysis (Appendix H. The analysis assumes the Project would be constructed in a single phase of development with a projected Opening Year of 2023. Access to the Project would be provided via: 1) Driveway 1 on Vista Del Sol (new full access), and 2) Betty Ford Way on Joe Friend Lane (existing full access).

Near-Term LOS Analysis

The Traffic Impact Analysis forecasted near-term Project impacts in an *Existing Plus Project (E+P)* scenario, which represents the roadway system if the completed Project's traffic was added to existing traffic. Project driveways and intersection and roadway improvements are assumed to be in place.

E+P weekday average daily traffic (ADT) volumes and AM/PM peak hour intersection volumes are shown on Exhibit 2.16-4. They include Project traffic plus existing traffic volumes. A comparison with Exhibit 2.16-2 (Existing 2019 Traffic Volumes) shows that the Project would result in limited ADT increases throughout the study area.



1 Bob Hope Dr. & MacMillan Wy.	**2** Bob Hope Dr. & Street A	**3** Bob Hope Dr. & Country Club Dr.	**4** John L. Sinn Dr. & Street A	**5** John L. Sinn Dr. & Country Club Dr.
998(663) → 250(40) ← 88(245) 308(1047) ← 35(3) →	762(656) → 174(28) ← 36(113) 371(921) ← 57(14) → 12(24)	43(43) → 519(525) → 109(180) ← 170(171) 68(70) → 196(272) → 98(84) ← 239(267) ← 205(191) 53(87) ← 333(606) ← 104(171) →	15(18) → 70(144) ← 24(15) → 17(78) ← 76(27) ← 244(80) →	22(63) → 0(8) → 86(377) ← 388(67) 53(13) → 330(593) → 16(12) ← 658(528) ← 14(11) 3(19) ← 1(1) ← 5(23) →
6 Joe Friend Ln. & Betty Ford Wy.	**7** Vista Del Sol & Dwy. 1	**8** Vista Del Sol/ Desert Lakes Dr. & Country Club Dr.		
50(119) → 21(3) → 6(20) ← 12(52) 110(35) ← 112(22) ←	6(1) → 5(5) ← 1(4) → 4(15) ← 25(4) ← 5(5) →	12(27) → 1(0) → 23(59) → 65(28) ← 1055(567) ← 20(31) 18(10) → 386(972) → 9(16) ← 14(16) ← 0(1) ← 21(25) ←		

LEGEND:

10(10) = AM(PM) PEAK HOUR INTERSECTION VOLUMES

10.0 = VEHICLES PER DAY (1000'S)

N

02.13.20

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Hazelden Betty Ford Center PDP EIR
Existing + Project (E+P) Traffic Volumes
Rancho Mirage, California

Hazelden Betty Ford Foundation

Exhibit

2.16-4

Table 2.16-4 compares intersection operations in the study area under existing (2019) conditions and E+P conditions. The Project would make a very limited contribution to increase delays at some of the study area intersections. The maximum impact would be an additional 1.3-second delay at the intersection of Bob Hope Drive & Street A (Intersection #2) during the PM peak hour, and Intersection #2 would operate at an unacceptable LOS E in the PM peak hour. However, it currently operates at an unacceptable LOS E during the PM peak hour without the Project, and the Traffic Impact Analysis determined that a traffic signal is currently warranted without the Project.

Table 2.16-4
Intersection Analysis for E+P Conditions

			Existing (2019)				E+P			
#	Intersection	Traffic Control[2]	Delay[1] (secs.)		Level of Service		Delay[1] (secs.)		Level of Service	
			AM	PM	AM	PM	AM	PM	AM	PM
1	Bob Hope Drive & MacMillan Way/ Emerg. Rm. Access Rd.	CSS	9.9	20.7	A	C	9.9	21.0	A	C
2	Bob Hope Drive & Street A	CSS	31.5	**38.7**	D	**E**	31.7	**40.0**	D	**E**
3	Bob Hope Drive & Country Club Drive	TS	21.1	22.2	C	C	21.1	22.3	C	C
4	John L. Sinn Road & Street A	CSS	11.5	9.7	B	A	12.2	9.9	B	A
5	John L. Sinn Road & Country Club Drive	TS	13.6	15.6	B	B	13.8	15.7	B	B
6	Joe Friend Lane & Betty Ford Way	CSS	9.9	9.6	A	A	10.2	9.9	B	A
7	Vista Del Sol & Driveway 1	--/CSS	future intersection				8.5	8.5	A	A
8	Vista Del Sol/Desert Lakes Drive & Country Club Drive	TS	8.6	9.0	A	A	8.8	9.5	A	A

BOLD = LOS does not meet the applicable jurisdictional requirements (i.e., unacceptable LOS).
[1] Per the Highway Capacity Manual (6th Edition), overall average intersection delay and level of service are shown for intersections with a traffic signal or all-way stop control. For intersections with cross street stop control, the delay and level of service for the worst individual movement (or movements sharing a single lane) are shown.
[2] CSS = Cross-street Stop; TS = Traffic Signal
Source: Table 5-1, Hazelden Betty Ford Center Traffic Impact Analysis, Urban Crossroads, February 4, 2020.

There would be no Project-area intersections that would operate at an unacceptable LOS with the addition of Project traffic, and no intersections are anticipated to warrant a traffic signal as a result of the Project. However, the Project would very marginally contribute to continued unacceptable LOS at Intersection #2 and, therefore, should contribute a fair-share percentage of costs for a future traffic signal, calculated in the Traffic Impact Analysis as 0.9%, to mitigate impacts to Intersection #2 (Mitigation Measure CIR-1). As shown below, the traffic signal would improve AM intersection operations from LOS D to LOS A, and PM operations from LOS E to LOS A.

Table 2.16-5
Intersection Analysis for E+P Conditions With Improvements

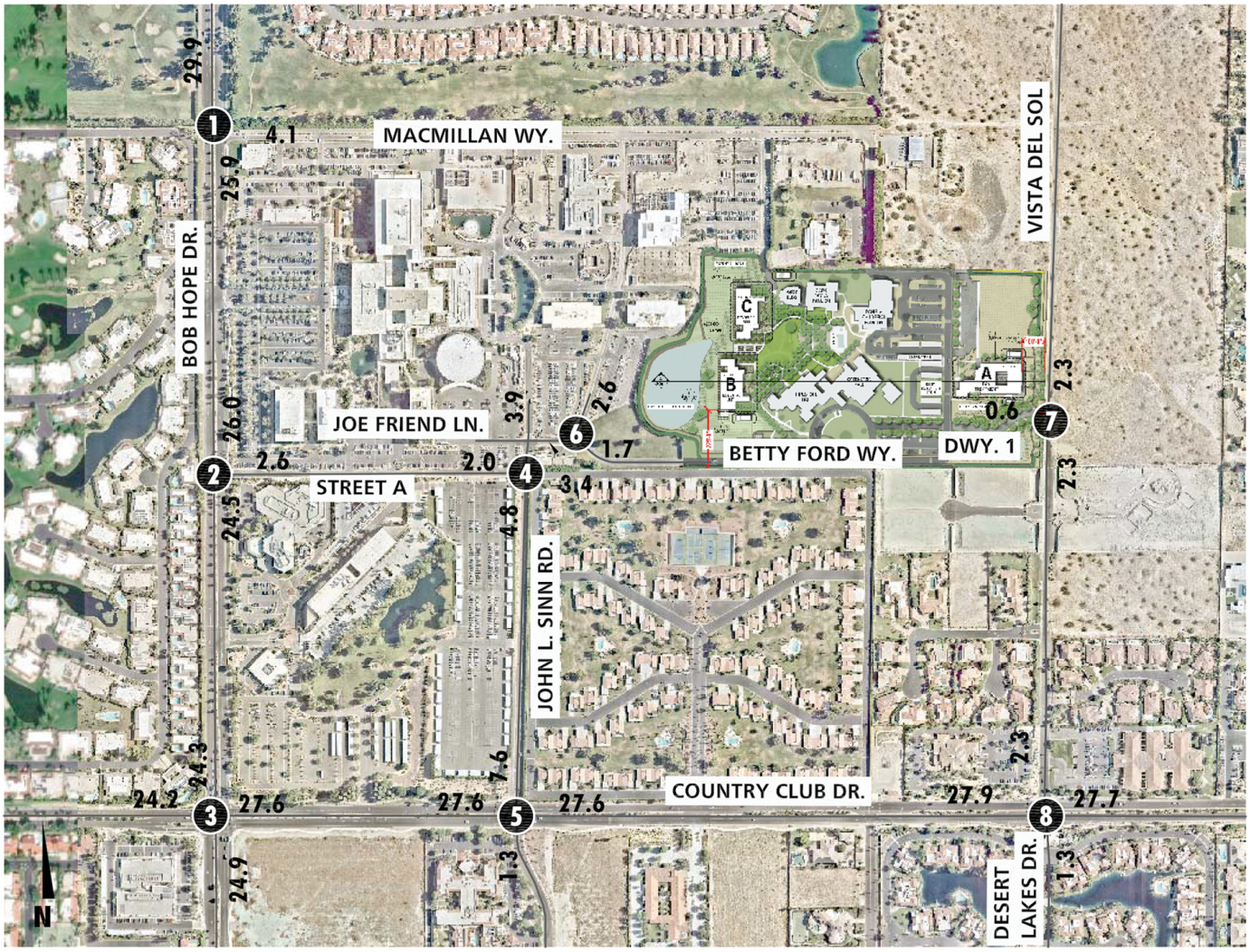
#	Intersection	Traffic Control[2]	Delay[1] (secs.)		Level of Service	
			AM	PM	AM	PM
2	Bob Hope Drive & Street A					
	- Without Improvements	CSS	31.7	**40.0**	D	**E**
	- With Improvements	**TS**	7.8	9.1	A	A

BOLD = LOS does not meet the applicable jurisdictional requirements (i.e., unacceptable LOS).
[1] Per the Highway Capacity Manual (6th Edition), overall average intersection delay and level of service are shown for intersections with a traffic signal or all way stop control. For intersections with cross street stop control, the delay and level of service for the worst individual movement (or movements sharing a single lane) are shown.
[2] CSS = Cross-street Stop; TS = Traffic Signal; **TS** = Improvement
Source: Table 5-2, Hazelden Betty Ford Center Traffic Impact Analysis, Urban Crossroads, February 4, 2020.

Long-Term LOS Analysis

The Traffic Impact Analysis forecasted long-term Project impacts in a *General Plan Buildout (2040) With Project* scenario, which represents the roadway system with the completed Project and with year 2040 General Plan Buildout traffic conditions. Project driveways and prescribed General Plan intersection and roadway improvements are assumed to be in place in the 2040 scenario.

Weekday average daily traffic (ADT) volumes and AM/PM peak hour intersection volumes are shown on Exhibit 2.16-5. They include Project traffic plus modeled year 2040 traffic volumes derived from the Riverside County Transportation Analysis Model (RivTAM).



1 Bob Hope Dr. & MacMillan Wy.

1248(1083) 303(49) 106(295) 858(1316) 42(4)

2 Bob Hope Dr. & Street A

967(1083) 207(33) 43(135) 15(32) 858(1166) 73(18)

3 Bob Hope Dr. & Country Club Dr.

116(199) 652(663) 188(320) 253(226) 583(793) 360(298) 238(89) 483(670) 166(144) 98(195) 421(764) 155(355)

4 John L. Sinn Dr. & Street A

19(25) 86(181) 34(19) 20(93) 90(32) 308(98)

5 John L. Sinn Dr. & Country Club Dr.

27(80) 0(10) 103(454) 470(82) 1195(1311) 18(14) 71(17) 817(1343) 29(22) 9(36) 1(1) 7(28)

6 Joe Friend Ln. & Betty Ford Wy.

60(142) 30(4) 8(27) 18(76) 131(42) 156(30)

7 Vista Del Sol & Dwy. 1

23(4) 69(118) 3(13) 6(26) 44(7) 106(76)

8 Vista Del Sol/ Desert Lakes Dr. & Country Club Dr.

36(48) 1(0) 34(79) 89(41) 1204(1311) 24(37) 32(37) 815(1348) 11(19) 17(19) 0(1) 25(30)

LEGEND:

10(10) = AM(PM) PEAK HOUR INTERSECTION VOLUMES

10.0 = VEHICLES PER DAY (1000'S)

N

02.13.20

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Hazelden Betty Ford Center PDP EIR
General Plan Buildout (2040)
With Project Traffic Volumes
Rancho Mirage, California

Hazelden Betty Ford Foundation

Exhibit
2.16-5

The following table compares LOS operations for study area intersections at General Plan Buildout (2040) without and with the proposed Project. As shown, Intersection #1 is projected to operate at an unacceptable LOS E during the PM peak hour without and with the Project. In addition, Intersection #2 is projected to operate at an unacceptable LOS F during AM and PM peak hours without and with the Project.

Table 2.16-6
Intersection Analysis for General Plan Buildout (2040) Conditions

			2040 Without Project				2040 With Project			
			Delay[1] (secs.)		Level of Service		Delay[1] (secs.)		Level of Service	
#	Intersection	Traffic Control[2]	AM	PM	AM	PM	AM	PM	AM	PM
1	Bob Hope Drive & MacMillan Way/ Emerg. Rm. Access Rd.	CSS	15.9	**42.0**	C	**E**	16.1	**43.2**	C	**E**
2	Bob Hope Drive & Street A	CSS	**>100**	**>100**	**F**	**F**	**>100**	**>100**	**F**	**F**
3	Bob Hope Drive & Country Club Drive	TS	43.1	45.3	D	D	43.9	45.6	D	D
4	John L. Sinn Road & Street A	CSS	13.6	10.3	B	B	14.5	10.4	B	B
5	John L. Sinn Road & Country Club Drive	TS	19.0	41.2	B	D	19.4	42.0	B	D
6	Joe Friend Lane & Betty Ford Way	CSS	10.6	10.2	B	B	11.0	10.4	B	B
7	Vista Del Sol & Driveway 1	--/CSS	future intersection				9.3	9.4	A	A
8	Vista Del Sol/Desert Lakes Drive & Country Club Drive	TS	11.1	12.5	B	B	11.4	12.7	B	B

BOLD = LOS does not meet the applicable jurisdictional requirements (i.e., unacceptable LOS).
[1] Per the Highway Capacity Manual (6th Edition), overall average intersection delay and level of service are shown for intersections with a traffic signal or all-way stop control. For intersections with cross street stop control, the delay and level of service for the worst individual movement (or movements sharing a single lane) are shown.
[2] CSS = Cross-street Stop; TS = Traffic Signal
Source: Table 8-1, Hazelden Betty Ford Center Traffic Impact Analysis, Urban Crossroads, February 4, 2020.

With and due to the addition of Project traffic, no study area intersection would operate at unacceptable LOS, and no additional intersections are anticipated to warrant a traffic signal. However, the Project would contribute to continued unacceptable LOS at Intersections #1 and #2. The Traffic Impact Analysis recommends no future improvements to Intersection #1 because the addition of a traffic signal may impede overall traffic circulation due to the restricted access (i.e., left-in/right-out only). As regards Intersection #2, the Project should pay a fair-share percentage of costs for a future traffic signal, calculated in the Traffic Impact Analysis as 0.9%, to mitigate impacts (Mitigation Measure CIR-1). As shown below, a traffic signal would improve intersection operations from LOS F to LOS A.

Table 2.16-7
Intersection Analysis for General Plan Buildout (2040) Conditions With Improvements

#	Intersection	Traffic Control[2]	Delay[1] (secs.)		Level of Service	
			AM	PM	AM	PM
2	Bob Hope Drive & Street A					
	- Without Improvements	CSS	**>100**	**>100**	**F**	**F**
	- With Improvements	**TS**	9.8	9.8	A	A

BOLD = LOS does not meet the applicable jurisdictional requirements (i.e., unacceptable LOS).
[1] Per the Highway Capacity Manual (6th Edition), overall average intersection delay and level of service are shown for intersections with a traffic signal or all way stop control. For intersections with cross street stop control, the delay and level of service for the worst individual movement (or movements sharing a single lane) are shown.
[2] CSS = Cross-street Stop; TS = Traffic Signal; **TS** = Improvement
Source: Table 8-2, Hazelden Betty Ford Center Traffic Impact Analysis, Urban Crossroads, February 4, 2020.

Site Access Improvements

Internal Intersections
The Project proposes two intersections in the immediate HBFC campus area: 1) Vista Del Sol & Driveway 1, and 2) the existing Joe Friend Lane & Betty Ford Way. The Traffic Impact Analysis analyzed the adequacy of vehicle turning pocket lengths (stacking distances) at both intersections and determined that available existing and proposed stacking distances would adequately accommodate anticipated traffic queues during the AM and PM peak hours under both the E+P and EAP (2023) scenarios.[7] Impacts of these intersections on internal traffic operations within the HBFC campus and on adjoining streets would be less than significant.

Proposed Access Driveway at Vista Del Sol
The proposed access driveway between the HBFC campus and Vista Del Sol would provide a new entry/exit for Project traffic and modestly increase traffic volumes on Vista Del Sol. Traffic counts performed in December 2019 determined there were 117 average daily vehicle trips (ADT) on Vista Del Sol north of Country Club Drive (current conditions without the Project).[8] The Traffic Impact Analysis projected that the Project would generate 562 daily vehicle trips.[9]

It is anticipated that 50% (281) of the Project's daily vehicle trips would use Vista Del Sol. In the near-term (year 2023), 40% (225) of Project daily vehicle trips are projected to travel on Vista Del Sol between the Project and Country Club Drive, and 10% (56) daily vehicle trips are projected on Vista Del Sol between the Project and Frank Sinatra Drive. In the long-term (General Plan buildout, year 2040), 25% (141) Project daily vehicle trips are anticipated on each of the two roadway segments. The Rancho Mirage General Plan Circulation Element classifies Vista Del Sol as a Local Street with a 60-foot right-of-way and a 40-foot paved section.

Local Streets have a design capacity of approximately 12,000 vehicles per day depending on roadway conditions, number of access points and other factors. The additional Project-generated vehicle trips on Vista Del Sol in the near term and long term represent only 2.3% of Vista Del Sol's buildout capacity. The addition of Project vehicle trips on Vista Del Sol would not exceed the design capacity of Vista Del Sol or any other local roadway affected by the Project. Impacts would be less than significant.

Nonetheless, new streets and roadway improvements must be consistent with General Plan policies and other City standards. General Plan goals and policies emphasize the importance of providing a circulation system that provides sufficient capacity for existing and projected traffic. Implementation of Mitigation Measures CIR-2 through CIR-5 will assure that Vista Del Sol is improved to its ultimate half-section width and that Project-related impacts associated with site access improvements are less than significant.

Transit, Bicycle, and Pedestrian Facilities

The Project site plan proposes internal sidewalks that would provide pedestrian access between onsite campus buildings and parking lots. Other than internal sidewalks, the Project does not propose new or altered transit, bicycle, or pedestrian facilities that would impact the surrounding circulation network. SunLine Transit Agency has indicated it is not requesting inclusion of any Project-related transit amenities.[10] No impact would occur.

7 Table 1-3, Ibid.
8 p. 3.1-50, Appendix 3.1, Ibid.
9 Table 4-1, Ibid. Trip generation rates are from the Institute of Transportation Engineers (ITE) Trip Generation Manual (10th Edition), 2017.
10 Letter from Todd McDaniel of SunLine Transit Agency, to Ben Torres of City of Rancho Mirage, January 8, 2020.

b) Conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)?

Less Than Significant Impact. CEQA Guidelines Section 15064.3 states that "generally, vehicle miles traveled (VMT) is the most appropriate measure of transportation impacts. For the purposes of this section, 'vehicle miles traveled' refers to the amount and distance of automobile travel attributable to a project. Other relevant considerations may include the effects of the project on transit and non-motorized travel." A lead agency may use models or other methods to analyze a project's VMT quantitatively or qualitatively. According to CEQA Guidelines Section 15064.3 subdivision (b), for land use projects (such as the proposed Project), "vehicle miles traveled exceeding an applicable threshold of significance may indicate a significant impact. Generally, projects within one-half mile of either an existing major transit stop or stop along an existing high-quality transit corridor should be presumed to cause a less than significant transportation impact. Projects that decrease vehicle miles traveled in the Project area compared to existing conditions should be considered to have a less than significant transportation impact."

The City of Rancho Mirage does not have an applicable threshold of significance for vehicle miles traveled. However, the proposed Project is within ½-mile of SunLine Transit Agency's fixed bus Route 32 that extends along Bob Hope Drive west of the Project site and Country Club Drive to the south; it operates during the morning and afternoon peak commuting periods. Existing bus stops are located on both sides of Bob Hope Drive at the EMC main entrance and both sides of Country Club Drive at John L. Sinn Road and 1/8th mile to the east on the northside of Country Club Drive. Use of transit by Project employees, patients, and/or visitors can be expected to reduce Project-generated VMTs. Therefore, Project conflicts or inconsistencies with CEQA Guidelines Section 15064.3, subdivision (b) would be less than significant.

c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

No Impact. The Project does not propose a hazardous geometric design feature. As discussed in 2.16.6.a, above, the new access driveway between the HBFC campus and Vista Del Sol, and improvements to Vista Del Sol itself, would be required to comply with General Plan Circulation Element policies and applicable City roadway improvement standards. No design hazards are anticipated. The Project vehicle mix would generally include passenger cars and limited trucks and delivery vehicles, which is compatible with existing mix of vehicles in the vicinity. No impact would occur.

d) Result in inadequate emergency access?

Less Than Significant Impact. The Project is expected to have a beneficial impact on emergency access. Emergency vehicle access is currently provided via a circuitous route through the EMC campus either from John Sinn Road or Bob Hope Drive, thence along Betty Ford Way. An additional, gated secondary/emergency access into the EMC campus is located in the northwest portion of the HBFC site just east of the Barbara Sinatra Children's Center. The Project would add a new access driveway on Vista Del Sol into the HBFC campus, which would provide another emergency access point and direct connection between Country Club Drive on the south and Frank Sinatra Drive on the north. It should be noted that the new HBFC Vista Del Sol access drive would not be available to or be used by EMC-bound emergency vehicles. Impacts would be beneficial and less than significant.

2.16.7 Mitigation Measures

Implementation of the following mitigation measures would reduce potential Project-related impacts to less than significant levels.

CIR-1 The Project proponent shall be responsible for paying the Project's fair-share percentage (0.9%) of costs of a traffic signal at the intersection of Bob Hope Drive & Street A (Intersection #2), as determined in the Project Traffic Impact Analysis prepared by Urban Crossroads, Inc. in February 2020.

CIR-2 The Project proponent shall improve Vista Del Sol to its ultimate half-section width as a Local Street (60-foot right-of-way) between the Project's northern and southern boundaries, consistent with the City of Rancho Mirage General Plan Circulation Element. Vista Del Sol shall be improved as required by the final conditions of approval for the Project and applicable City of Rancho Mirage standards.

CIR-3 The intersection of Vista Del Sol & Driveway 1 shall be constructed with a stop control on the eastbound approach and the following geometrics:

- northbound approach: one shared left-through turn lane
- southbound approach: one shared through-right turn lane
- eastbound approach: one shared left-right turn lane
- westbound approach: not applicable (N/A)

CIR-4 Onsite traffic signing and striping shall be implemented in conjunction with detailed construction plans for the Project.

CIR-5 Sight distances at each Project access point shall be reviewed with respect to standard Caltrans and City of Rancho Mirage sight distance standards at the time of preparation of final grading, landscape, and street improvement plans.

CIR-6 The Project shall pay applicable fees in accordance with the Transportation Uniform Mitigation Fee (TUMF) program administered by the Coachella Valley Association of Governments (CVAG).

2.16.8 Significance After Mitigation

With implementation of Mitigation Measures CIR-1 through CIR-6, Project impacts will be less than significant.

2.16.9 Cumulative Impacts

The Traffic Impact Analysis analyzed cumulative Project impacts in an *Existing plus Ambient Growth plus Project plus Cumulative (EAPC) (2023)* scenario, which represents the circulation system for existing traffic, plus ambient growth, plus the Project, plus cumulative background growth. It represents conditions at Project buildout in year 2023 and assumes Project driveways and related site access facilities, as well as those to be constructed by cumulative developments, are in place. An ambient growth factor from existing conditions of 8.24% (2% per year over 4 years, compounded annually) was used to account for background traffic growth. Traffic conditions include reasonably foreseeable development projects that are either approved or being processed concurrently in the study area, including 30 projects in Rancho Mirage and 32 in neighboring Palm Desert.

EAPC (2023) peak hour traffic operations were evaluated for all study area intersections. As shown in the following table, there would be no additional intersections operating at an unacceptable LOS with the addition of ambient growth, cumulative projects, and Project traffic. No additional study area intersections are anticipated to warrant a traffic signal.

Table 2.16-8
Intersection Analysis for EAPC (2023) Conditions

			Existing (2019)				EAPC (2023)			
			Delay[1] (secs.)		Level of Service		Delay[1] (secs.)		Level of Service	
#	Intersection	Traffic Control[2]	AM	PM	AM	PM	AM	PM	AM	PM
1	Bob Hope Drive & MacMillan Way/ Emerg. Rm. Access Rd.	CSS	9.9	20.7	A	C	10.2	28.4	B	D
2	Bob Hope Drive & Street A	CSS	31.5	**38.7**	D	**E**	**41.7**	**60.1**	**E**	**F**
3	Bob Hope Drive & Country Club Drive	TS	21.1	22.2	C	C	22.4	24.1	C	C
4	John L. Sinn Road & Street A	CSS	11.5	9.7	B	A	12.7	10.0	B	B
5	John L. Sinn Road & Country Club Drive	TS	13.6	15.6	B	B	14.7	17.0	B	B
6	Joe Friend Lane & Betty Ford Way	CSS	9.9	9.6	A	A	10.4	10.0	B	B
7	Vista Del Sol & Driveway 1	--/CSS	future intersection				8.5	8.5	A	A
8	Vista Del Sol/Desert Lakes Drive & Country Club Drive	TS	8.6	9.0	A	A	9.5	10.0	A	A

BOLD = LOS does not meet the applicable jurisdictional requirements (i.e., unacceptable LOS).
[1] Per the Highway Capacity Manual (6th Edition), overall average intersection delay and level of service are shown for intersections with a traffic signal or all-way stop control. For intersections with cross street stop control, the delay and level of service for the worst individual movement (or movements sharing a single lane) are shown.
[2] CSS = Cross-street Stop; TS = Traffic Signal
Source: Table 7-1, Hazelden Betty Ford Center Traffic Impact Analysis, Urban Crossroads, February 4, 2020.

The intersection of Bob Hope Drive & Street A (Intersection #2) currently (without the Project) operates at an unacceptable LOS E during the PM peak hour and warrants a traffic signal. The Project would contribute to additional and ongoing intersection delays and, therefore, should pay a fair-share percentage of costs for a future traffic signal, calculated in the Traffic Impact Analysis as 0.9%, to mitigate Project-related cumulative impacts to Intersection #2 (Mitigation Measure CIR-1). As shown in the following table, it would improve intersection operations from LOS E during the AM peak hour and LOS F during the PM peak hour (current conditions), to LOS A during both AM and PM peak hours (EACP 2023 conditions).

Payment of Transportation Uniform Mitigation Fees (TUMF) will mitigate cumulative Project impacts on regional transportation facilities (Mitigation Measure CIR-6). With mitigation, Project cumulative impacts would not be cumulatively considerable and would be less than significant.

Table 2.16-9
Intersection Analysis for EACP (2023) Conditions With Improvements

#	Intersection	Traffic Control[2]	Delay[1] (secs.)		Level of Service	
			AM	PM	AM	PM
2	Bob Hope Drive & Street A					
	- Without Improvements	CSS	**41.7**	**60.1**	**E**	**F**
	- With Improvements	**TS**	8.1	9.4	A	A

BOLD = LOS does not meet the applicable jurisdictional requirements (i.e., unacceptable LOS).
[1] Per the Highway Capacity Manual (6th Edition), overall average intersection delay and level of service are shown for intersections with a traffic signal or all way stop control. For intersections with cross street stop control, the delay and level of service for the worst individual movement (or movements sharing a single lane) are shown.
[2] CSS = Cross-street Stop; TS = Traffic Signal; **TS** = Improvement
Source: Table 7-2, Hazelden Betty Ford Center Traffic Impact Analysis, City of Rancho Mirage, Urban Crossroads, February 4, 2020.

2.17 Utilities and Service Systems

2.17.1 Introduction

This section of the EIR discusses potential impacts to utilities and service systems, including water supply, wastewater and sewer service, storm drainage, and solid waste disposal resulting from implementation of the HBFC PDP Project. A wide range of available resources, including the City's General Plan and CVWD, SCE, and Burrtec published documents and annual reports, have been used in researching and analyzing the Project and its potential effects. These include detailed analysis of existing utility lines and future extensions and conditions.

2.17.2 Thresholds of Significance

The following criteria from CEQA Guidelines Appendix G have been used to evaluate the significance of the proposed Project's potential impacts to utilities and service systems. Would the Project:

a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects. (see Section 2.10 addressing stormwater)?

b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

2.17.3 Regulatory Framework

Federal

No federal regulations relative to utilities and service systems would be applicable to the proposed HBFC Project.

State

California Integrated Waste Management Act of 1989

The California Integrated Waste Management Act of 1989 (Public Resources Code, Division 30), enacted through Assembly Bill (AB) 939 and modified by subsequent legislation, required all California cities and counties to implement programs to reduce, recycle, and compost at least 50 percent of wastes by the year 2000 (Public Resources Code Section 41780). CalRecycle determines compliance with this mandate to divert generated waste, including both disposed and diverted waste.

In 2007, Senate Bill (SB) 1016 amended AB 939 to establish a per capita disposal measurement system. The per capita disposal measurement system is based on a jurisdiction's reported total disposal of solid waste divided by its population. California's Integrated Waste Management Board sets a target per capita disposal rate for each jurisdiction. Each jurisdiction must submit an annual report to California's Integrated Waste Management Board with an update of its progress in implementing diversion programs and its current per capita disposal rate.

California Assembly Bill 341
In October 2011, Assembly Bill 341 was signed into law, setting a 75% recycling goal for California by year 2020. The legislation mandates that all California commercial or public entities that generate 4 or more cubic yards of solid waste per week, and multifamily dwellings of 5 or more units, must arrange recycling services by and following July 1, 2012. Individual jurisdictions determined compliance measures and due dates. Per Public Resources Code Section 41821 (annual reporting), each jurisdiction is required to electronically report the progress achieved which is reviewed by CalRecycle.

CALGreen Code
CALGreen Code Section 4.408, Construction Waste Reduction, Disposal and Recycling mandates that, in the absence of a more stringent local ordinance, a minimum of 50 percent of non-hazardous construction and demolition debris must be recycled or salvaged. The Code also requires the applicant to have a waste management plan for on-site sorting of construction debris.

Senate Bills 610 and 221
SB 221, enacted in 2001 and codified in Government Code Section 66473.7, requires a county, city, or local agency to include a condition to any tentative subdivision map that a sufficient water supply will be available to serve the subdivision. The term "sufficient water supply" is defined as the total water supplies available during a normal year, single dry year, and multiple dry years within a 20-year projection that would meet the proposed subdivision's projected water demand, in addition to existing and planned future water uses, including agricultural and industrial uses, within the specified service area. SB 221 further requires any verification of "projected" water supplies to be based on entitlement contracts, capital outlay programs, and regulatory permits and approvals.

Regional and Local

Riverside County Integrated Waste Management Plan
The Countywide Integrated Waste Management Plan (CIWMP) was prepared in accordance with the California Integrated Waste Management Act of 1989. To attain the reduction goals, AB 939 established a planning hierarchy utilizing new integrated solid waste management practices.[1] Riverside County revises the CIWMP every five years and publishes a Five-Year Review Report to assure that the County's waste management practices remain consistent with the hierarchy of waste management practices.

Rancho Mirage General Plan
The City of Rancho Mirage General Plan includes goals to promote water conservation, reduce the generation of solid waste, slow the filling of regional landfills, and improve recycling programs that divert valuable resources from the waste stream to productive use. Relevant policies are found in the Energy and Mineral Resources, and Water Quality and Water Resources sections of the Conservation and Open Space Element.

Energy and Mineral Resources

Policy COS 5.6 The City shall encourage the reduction and recycling of household and business waste.

Program COS 5.6D Ensure that any planned construction, demolition, addition, alteration, repair, remodel, landscaping, or grading projects divert all reusable, salvageable, and recyclable debris from landfill disposal.

[1] Riverside County Department of Waste Resources Website, http://www.rcwaste.org, accessed December 2019.

Water Quality and Water Resources

Policy COS 7.4 Require the use of alternative water supplies, such as recycled or canal water, for urban irrigation, where available.

Policy COS 7.5 Require new developments to establish and confirm the ability to meet current and future water resource demands.

Program COS 7.5A Require a water supply assessment and verification for applicable new developments per State law.

Program COS 7.5B Facilitate and require the use of water conserving appliances, fixtures, and plumbing in all new development.

Program COS 7.5C Provide information on the use of low flush toilets and low flow showerheads and faucets. Require the application of water conserving technologies in conformance with State law.

2.17.4 Environmental Setting

The Project area is well connected to the utilities network and served by the following providers:

Utility	Service Provider(s)
Electricity	Rancho Mirage Energy Authority; South California Edison (SCE)
Natural gas	Southern California Gas
Water	Coachella Valley Water District (CVWD)
Wastewater	Coachella Valley Water District (CVWD)
Solid waste	Burrtec
Telecommunications	Charter Spectrum, Frontier, Hughes Net

2.17.5 Existing Conditions

Water Service

Potable and non-potable water is provided to the City by the Coachella Valley Water District (CVWD). Water demand is supplied by groundwater in a domestic water system of 57 wells, 9 above-ground storage reservoirs (water tanks), and an extensive network of distribution lines ranging from 2 to 36 inches in diameter.[2] The Whitewater River sub-basin of the Coachella Valley Groundwater Basin is the groundwater repository for Rancho Mirage, recharged via natural sources of groundwater and imported water. Approximately 70% of the recharge water is imported from the Colorado River via the Metropolitan Water District Colorado River Aqueduct, and the remaining 30% from infiltration of runoff from the San Jacinto, Santa Rosa, and San Bernardino Mountains.

The Coachella Valley Groundwater Basin had been in an overdraft condition since the 1930s, but after implementation of groundwater recharge programs, water conservation efforts, and the processing and use of tertiary treated water over several decades, rising water levels in the Palm Springs area and slowing water level declines in the mid-Valley portion of the Whitewater River (Indio) subbasin have occurred. CVWD is involved in a variety of efforts to conserve finite ground water resources; for instance, CVWD provides educational landscape

[2] Rancho Mirage 2017 General Plan, Chapter 9 Public Services and Facilities, p.99.

programs and plan checking services to promote drought-tolerant landscaping. CVWD has also developed tertiary wastewater treatment capabilities and is providing tertiary treated water to various golf courses and to public landscaped areas in the vicinity of the Cook Street treatment plant in Palm Desert.

Wastewater Service

CVWD provides wastewater and sewage collection and treatment services in Rancho Mirage. The effluent is conveyed to the Cook Street Wastewater Reclamation Plant (WRP-10) in Palm Desert, which is the regional wastewater treatment facility serving the cities of Rancho Mirage, Indian Wells, and Palm Desert, and a portion of Cathedral City. CVWD recently upgraded sewer lines serving Rancho Mirage and completed the expansion of the WRP-10, doubling the capacity from 10 to 20 million gallons per day. Nearly 6.3 billion gallons of wastewater are treated annually, which is equivalent to 86% of current treatment capacity.[3] CVWD has also expanded its wastewater distribution system to serve more golf courses and is modifying operations to allow 24-hour delivery of tertiary treated water in an effort to reduce the demand for groundwater.

CVWD continually increases the capacity of its wastewater reclamation facilities, as needed, by constructing new treatment ponds, aeration facilities, and other structures. CVWD implements all applicable requirements of the Regional Water Quality Control Board pertaining to water quality and wastewater discharge.

Electricity

Southern California Edison (SCE) provides electrical service to the City of Rancho Mirage and many of the surrounding areas, serving approximately fifteen (15) million people within a service area of approximately 50,000 square miles, including the Coachella Valley. SCE generates power from a variety of energy sources, including coal, natural gas, large hydroelectric, nuclear, and renewable sources (which include small hydroelectric, solar, wind, geothermal, biomass, and waste sources).

According to the Rancho Mirage Community Choice Aggregation Implementation Plan, city-wide electricity demand in Rancho Mirage in 2018 was projected at 214,120,000 kWh.[4] This includes electricity consumed by municipal buildings, residential, commercial, and industrial land uses, and resorts and golf courses, combined.

Rancho Mirage Energy Authority (RMEA) is a community choice aggregation program created by the City of Rancho Mirage aiming to provide cost-competitive electricity and cleaner energy choices. This service is available exclusively to Rancho Mirage residents and businesses currently served by Southern California Edison. RMEA rates are set by the Rancho Mirage City Council. Customers are automatically enrolled into RMEA's program and have the options to upgrade to Premium Renewable Choice or Solar Choice or opt out of RMEA.

Natural Gas

Natural gas is provided to the City of Rancho Mirage by the Southern California Gas Company (SoCalGas). The service territory of SoCalGas encompasses approximately 24,000 square miles in diverse terrain throughout central and southern California, from the City of Visalia to the Mexican border.[5] SoCalGas receives gas supplies from several sedimentary basins in the western United States and Canada, as well as local California supplies.[6]
Natural gas supplies are delivered to the region through interstate pipelines. Natural gas supplies are transported from Texas to the Coachella Valley through three east-west trending gas lines, which cross the Valley near and parallel to Interstate-10 and continue west to Los Angeles. According to the Rancho Mirage Energy Action Plan, city-wide natural gas consumption totaled 10,593,308 therms in 2010.[7] This includes natural gas consumed by residential, commercial, and industrial land uses, and resorts and golf courses.

3 Ibid, p.100.
4 Rancho Mirage Community Choice Aggregation Implementation Plan, October 2017.
5 SoCalGas, Company Profile, https://www.socalgas.com/about-us/company-profile, accessed December 2019.
6 2014 California Gas Report, California Gas and Electric Utilities.
7 Rancho Mirage Energy Action Plan 2013.

Telecommunications
Landline phone services in the City are mainly provided by Frontier Communications Corporation, the fourth largest provider of digital subscriber lines (based on coverage area) in the County. Internet services are provided by Charter Spectrum and Hughes Net.

Solid Waste
The City contracts with Burrtec for provision of solid waste management and disposal services. Burrtec offers services for businesses, construction-related activities, and special events, in addition to a variety of residential services. Most landfill waste is taken to the Edom Hill Transfer Station in northern Cathedral City. The Edom Hill Transfer Station has a maximum permitted throughput of 3,500 tons per day for general waste (e.g, agricultural, construction/demolition, food wastes, green materials, industrial, metals, tires). In addition, it has a separate area for composting (construction/demolition and green materials) with a maximum permitted throughput of 500 tons per day and a permitted capacity of 10,221 cubic yards. Recyclables are transported to a Material Recovery Facility (MRF) for sorting and processing, and then shipped to destinations for reuse and repurposing. The closest MRF to Rancho Mirage is the West Valley Transfer Station/MRF in Fontana.[8]

Landfill facilities serving the City of Rancho Mirage are Lamb Canyon Sanitary Landfill and Badlands Sanitary Landfill. Lamb Canyon has an average intake of 1,703 tons per day, maximum permitted throughput of 5,000 tons per day, current design capacity of 15.6 million tons, and expected closure date of 2029.[9] Badlands Landfill has an average intake of 1,667 tons per day, maximum permitted throughput of 4,800 tons per day, current design capacity of approximately 17.6 million tons, and expected closure date of 2022.[10]

2.17.6 Project Impacts

Would the Project:

a) ***Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects. (see Section 2.10 addressing stormwater)?***

b) ***Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?***

c) ***Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?***

Less Than Significant Impact.

Domestic Water Supply
CVWD is a public water agency with approximately 108,000 domestic water connections and a groundwater production capacity of over 300,000 AFY. Under the 1931 California Seven Party Agreement, CVWD has water rights to Colorado River water as part of the first 3.85 million acre-feet (AF) allocated to California. CVWD is implementing a variety of programs to conserve water resources, including groundwater replenishment, use of imported water, treatment and use of tertiary treated water, and conservation programs.

8 Rancho Mirage General Plan 2017, – Chapter 9 Public Services and Facilities, p.102.
9 Rancho Mirage Section 31 Specific Plan EIR, p.5.16.4-1.
10 Ibid.

As discussed in Section 2.10, Hydrology and Water Quality, the proposed Project would require approximately 27.85 AF of additional water annually. Approximately 15.62 AFY of the 27.85 AFY would be irrigation water, the demand for which will be partially met through the existing pond and recycled cooling tower water system. The net total Project water demand of 27.85 AFY represents approximately 0.02 percent of the total water supply (114,600 AFY) for 2020, and 0.01 percent of the total water supply (194,300 AFY) for 2040.[11] A comparison of existing available water supplies and the water needs of the Project demonstrates that CVWD has sufficient water supplies available to serve the Project in the future during normal, dry, and multiple dry years. The Project's incremental effect would not be cumulatively considerable with respect to water supply and, therefore, impacts would be less than significant.

Domestic Water Infrastructure

Existing CVWD domestic water lines (12" in diameter) run along the easterly boundary of the existing HBFC campus and within the Roxbury Drive right-of-way on the southerly boundary of the Project site. There is also a water line (6"-10") along the easterly boundary of the Project site within the Vista Del Sol right-of-way. There are no public wells onsite; the closest one is approximately 200 feet north of the Project site near the northeast corner of the Eisenhower Medical Center campus.

The Project will require extension of water lines within the site to connect to the existing CVWD water lines around the subject property. Extension of water lines will have less than significant impacts on expanded water services because the physical expansion will be limited within the site and Vista Del Sol right-of-way, and because the Project is replacing old buildings with more water-efficient new buildings and reducing turf area by using drought-tolerant desert landscaping.

Wastewater Services and Infrastructure

Existing CVWD wastewater pipelines (12" in diameter) are located east of the pond onsite, within the Roxbury Drive right-of-way on the southerly boundary of the Project site, and through the eastern portion of the subject site. A 15" PVC sewer main has been proposed along Vista Del Sol to connect to the existing 24" sewer main along Country Club Drive in the Section 31 Specific Plan.

The Project will result in 56 new patient beds, thus generating an additional 2,800 gallons of wastewater per day (based on 200 gallons per day for a four-person residence[12]) at buildout. Considering that water efficiency improvements in the new buildings will also reduce wastewater generation, the 2,800-gallon wastewater generation projection may be an overestimate. Current average annual flow at WRP-10 is 10.8 mgd, and the CVWD 2010 Urban Water Management Plan projects wastewater treatment at WRP-10 to be 15.53 million gallons per day (mgd) in year 2045. As such, the Project's potential net wastewater generation of 2,800 gallons per day would account for approximately 0.03% of current average flow, and 0.02% of year 2045 average flow. The Project's wastewater generation will be adequately served by existing facilities and will not require or result in the relocation or construction of new or expanded wastewater treatment facilities. Impacts would be less than significant.

Stormwater Drainage

The Project would introduce impervious surfaces in the Project area through the construction of buildings, pedestrian pathways, parking lots, and internal roadways. As explained in Section 2.10, Hydrology and Water Quality, to fully capture the 100-year storm runoff at Project buildout, two retention basins will be built on both sides of the new access road in the southerly portion of the site (Exhibit 1-5). As discussed in the preliminary hydrology study and Section 2.10, the design of the drainage systems has the capacity to accommodate Project 100-year flows. Therefore, the proposed Project will not require the construction of additional drainage facilities beyond those designed onsite, and impacts will be less than significant.

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11 114,600 AFY for 2020 and 194,300 AFY for 2040 are provided in the Coachella Valley Water District Urban Water Management Plan, prepared by MWH, July 1, 2016.

12 Coachella Valley Water District Sewer Service Rate Study Report, prepared by Stantec, May 16, 2017.

Electric Power

Existing SCE distribution lines (12kV) are located in proximity to the Project site, bordering the EMC campus along MacMillan Way (also known as Emergency Room Access Road) and Vista Del Sol toward Country Club Drive. The current electricity demand of the Hazelden Betty Ford Center is adequately served by SCE. Buildout of the Project would increase annual electricity demand by 521,146 kWh.[13] The Project will connect to the nearest existing underground distribution lines located east of the site. Construction of the Project will comply with applicable SCE guidelines regarding installation, extensions, and connections to limit impacts to electricity infrastructure and avoid service interruptions. No new SCE electric power facilities will need to be constructed or relocated. Impacts will be less than significant.

Natural Gas

In the Project area, existing underground high-pressure distribution lines run along Frank Sinatra Drive westbound to Vista Del Sol, then southbound to and along MacMillan Way bordering the EMC campus north of the Project site. Onsite gas lines run along the north and west sides of Dupont Hall (to be demolished) and the north side of the pool. Prior to ground disturbance, Project contractors would notify and coordinate with SoCalGas to identify the locations and depths of all existing gas lines and avoid disruption of gas service.

According to the CalEEMod outputs, at buildout, the Project would consume an additional 17,943 therms per year of natural gas,[14] which is less than 0.2 percent increase in annual City-wide usage (City-wide usage was 10,593,308 therms in 2010[15]). No additional natural gas facilities will need to be constructed or relocated. Impacts will be less than significant.

Telecommunication

The City is located within Frontier Communications' service area for telecommunication services. The Project will connect to existing telecommunication lines. Lines currently in place are sufficient to provide service to the Project, and no new lines are expected to be required. No impact is anticipated.

d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals.

e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste.

Less Than Significant Impact.

Construction Impacts

Demolition and construction of the proposed Project would generate solid waste in the form of trash and debris, asphalt and concrete waste, and other materials. All debris would be placed in appropriate onsite containers and periodically disposed of in accordance with applicable standards of waste disposal. Non-hazardous construction materials that cannot be reused or recycled would be accepted for disposal at municipal Riverside County landfills. As required by CalGreen, demolition of the existing structures and the waste created by construction activities will need to be recycled. This standard requirement will assure that impacts associated with construction waste remain less than significant.

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13 See Section 2.12 Minerals and Energy for detailed discussion. Annual kWh was estimated based on CalEEMod outputs using historical energy data for similar land use/building types and Project-specific building data.

14 See Section 2.12 Minerals and Energy for detailed discussion. Annual kWh was estimated based on CalEEMod outputs using historical energy data for similar land use/building types and Project-specific building data.

15 Rancho Mirage Energy Action Plan 2013.

Any hazardous materials (e.g. chemicals, oils, fuels, lubricants, paints, and solvents) used during construction would be recycled, treated, and/or disposed of in accordance with federal, State, and local laws (See Section 2.9, Hazards and Hazardous Materials). Construction-related solid waste generation will be finite, and regional landfills would have sufficient permitted capacity to accommodate the Project's construction-related solid waste disposal needs. Impacts will remain less than significant.

Operational Impacts

Based on the estimated solid waste generation rates established by CalRecycle, the Project would dispose of an additional maximum of ±20.44 tons of solid waste per year[16] at buildout by adding 56 new patients/beds. The Project would be required to achieve 50 percent waste diversion in accordance with Riverside County's Integrated Waste Management Plan (CIWMP); based on this requirement, the total solid waste generation for the Project will be approximately 10.22 tons per year.

Solid waste collected from the site will be hauled to the Edom Hill Transfer Station in Cathedral City and then transported to Lamb Canyon Landfill or Badlands Landfill. The Project will contribute 0.003% or 0.002% to Badlands' or Lamb Canyon's remaining capacity, respectively, as of 2015.[17][18] Recyclable materials (e.g., paper, plastic, glass, cardboard, aluminum) will be transported to Burrtec's material recovery facilities for recycling and reuse. Less than significant impacts would occur from the Project, and no mitigation will be required.

2.17.7 Mitigation Measures

No mitigation measures are required.

2.17.8 Significance After Mitigation

Impacts will be less than significant.

2.17.9 Cumulative Impacts

The scope for the analysis of cumulative impacts on utilities and service systems is consistent with the City's General Plan build out assumptions for year 2035.

CVWD provides water and wastewater services in the Project vicinity. The proposed Project will result in an increase of less than 0.01 percent of CVWD total water supply in year 2040. CVWD has adequate capacity to serve the Project along with current and future projects. Construction and operation of the proposed Project would not require the construction or expansion of stormwater or wastewater facilities because their impacts on these facilities will be minimal and sufficient capacity exists. When considered in conjunction with other projects in the City's General Plan boundaries, the proposed Project will have a marginal and fractional impact on services. Therefore, the Project's contribution to cumulative impacts related to these services would not be cumulatively considerable.

16 Hotel = 2 lb/room/day, CalRecycle.

17 Assumes that 1 CY of commercial and residential recyclable solid waste is equivalent to 100 lbs. (averaged). "Volume to Weight Conversion Factors," US EPA Office of Resource Conversion and Recovery. April 2016.

18 Remaining capacity is 15,748,799 Cubic Yards and 19,242,950 Cubic Yards for Badlands Landfill and Lamb Canyon Landfill, respectively, as of 2015. CalRecycle Solid Waste Information System (SWIS) Facility Detail, accessed February 4, 2020.

SCE and SoCal Gas have policies, programs, and projects in place to provide continued, adequate energy to their users, including the proposed Project, for the foreseeable future. As discussed above, the Project would only increase the City's overall electricity demand by less than 0.3 percent, and natural gas demand by less than 0.2 percent. Therefore, the proposed Project's incremental demand for energy would not be cumulatively considerable.

Regarding solid waste, implementation of State and municipal requirements to reuse and recycle construction and operation waste would lessen the amount of solid waste generated by the Project. When considered in conjunction with other development projects in the region, the solid waste generated by the proposed Project will represent a fractional increase in waste to landfills. Cumulative impacts would be less than significant.

Overall, implementation of the proposed Project would not result in cumulatively considerable impacts related to utilities and service systems; and cumulative impacts would be less than significant.

Hazelden Betty Ford Center Preliminary Development Plan Project

DRAFT ENVIRONMENTAL IMPACT REPORT

3. ALTERNATIVE PROJECTS ANALYSIS

3.1. Introduction

While Section 2 provides a detailed analysis of a full range of potential impacts associated with the proposed HBFC PDP Project (Project), this section of the EIR addresses the potential impacts associated with the development of alternatives to the proposed Project.

As required by CEQA Guidelines (Section 15126.6), Section 3 sets forth the key objectives that this Project seeks to fulfill. CEQA requires the analysis of "a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project" (Guidelines, Section 15126.6(c)). This section also states that the EIR "must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation."

An EIR is not required to consider alternatives which are infeasible. Therefore, this section of the EIR describes and analyzes the potential impacts of three potentially feasible alternatives: Alternative A: "Less Intense" Alternative; Alternative B: "More Intense" Alternative; and Alternative C: "No Project" Alternative (Guidelines, Section 15126(3)), which considers impacts associated with the continued use of the existing facilities.

Impacts assessed in Section 3 include those related to land use compatibility, traffic and circulation, soils and geology, air and water quality, hydrological issues, population and housing, and biological, cultural, and visual resources, as listed below. To provide a basis for comparison with each of the areas of environmental impact that were analyzed in Section 2, the same resource topics are considered in this section for each alternative. The possibility of identifying a different site for the Proposed Project is also discussed in this section (Guidelines, Section 15126.6(f)(2)).

This EIR analyzes the following resource topics:

- Aesthetics
- Air Quality
- Biological Resources
- Cultural and Tribal Cultural Resources
- Geology and Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Resources
- Land Use and Planning
- Mineral and Energy Resources
- Noise
- Population, Housing and Socio-Economic Resources
- Public Services
- Transportation and Traffic
- Utilities and Service Systems

Where mitigation is required for an alternative and the same mitigation measures required for the Proposed Project in Section 2 apply, a reference to the appropriate Section 2 mitigation measures is made. Where additional mitigation measures are required for an alternative, the alternative-specific mitigation measures are listed in this section.

3.1.1. Statement of Project Goals and Objectives

CEQA Guidelines Section 15126.6 states that an EIR must describe and evaluate a reasonable range of alternatives to a project that would feasibly attain most of the project's basic objectives, but that would avoid or substantially lessen any identified significant adverse environmental effects of the project. The EIR should also evaluate the comparative merits of the project. Specifically, Section 15126.6 sets forth criteria for selecting and evaluating alternatives. A Draft EIR may support a determination of No Significant Impacts from implementation of the Proposed Project with the implementation of mitigation measures set forth in this EIR.

Pursuant to CEQA Guidelines Section 15124(b), the project description includes a statement of objectives. The purpose of the objectives is to assist the HBFC in developing a reasonable range of project alternatives to evaluate in this EIR. These objectives are intended to explain the purpose of the project, and to aid the decision-makers in preparing findings or a statement of overriding considerations, if necessary.

The project objectives identify the purpose of the Project. HBFC has identified the following list of criteria as the objectives for the Project.

- Complete a comprehensive update to the Hazelden Betty Ford Center campus master site plan
- Replace older and outdated residential treatment buildings with modern, more efficient facilities
- Broadened capabilities including a new stand-alone day-treatment facility
- New primary access from Vista Del Sol with appropriate entry and arrival statement
- Renovated site landscaping with increased use of desert and drought-tolerant landscape materials
- Integrated renewable energy systems that reduce reliance on SCE grid sources
- Enhance the Center's ability to meet the changing regimens for treating patients with a substance use disorder

3.1.2. Summary of Alternatives

The Hazelden Betty Ford Center has been located and operating at its present site since 1982. The center has been an integral part of the Eisenhower Medical Center campus, with access, utilities and other services passing through the EMC campus to serve the HBFC site. However, in all other respects, HBFC is independent of EMC. The project alternatives analyzed herein provide a comparative basis for evaluation of the Proposed Project. Each alternative is briefly described below. Alternatives considered but not analyzed further are also discussed.

3.1.3. Alternative A – "Less Intense" Alternative

This alternative provides an opportunity to gauge the effects of the Proposed Project against a less intense development alternative, which results in fewer additional patient beds and less overall square footage. An overall 25% reduction in the intensity of new uses is assumed for this alternative versus the Proposed Project. This alternative also assumes that access to the HBFC campus would continue to be limited to Betty Ford Way within the Eisenhower Medical Center Campus. The following table summarizes Alternative A.

Table 3-1
HBFC PDP Project – Less Intense Alternative A

Building Name	Existing No. of Beds	Alt. A No. of Beds	Existing Sq. Ft.	Alt. A Sq. Ft.	Change Sq. Ft. (+/-)
Fisher Hall	20		12,818	0	(12,818)
Pocklington Hall	20		12,894	0	(12,894)
McCallum Hall	20		12,988	0	(12,988)
DuPont (North) Hall	20		12,994	0	(12,994)
Cork Family Pavilion	-		11,968	11,968	-
Firestone Hall	-		17,662	17,662	-
Residential Building #1	**-**	**35**	**-**	**23,250**	**23,250**
Residential Building #2	**-**	**35**	**-**	**23,250**	**23,250**
Daniels Building	-		-	-	
Office Spaces			25,606	25,606	-
Conference Rooms			10,975	10,975	-
Ottenstein Hall	20	20	14,700	14,700	-
West Building			4,595	4,595	
Day Treatment Bldg.					
Administrative Space				**6,399**	**6,399**
Day Treatment Functions		**33**		**12,262**	**12,262**
Totals	**100**	**123**	**137,200**	**150,667**	**13,467**

3.1.4. Alternative B – "More Intense" Alternative

This alternative allows the gauging of effects of a greater intensification of the proposed land use, which results in a greater increase in the number of patient beds and an overall increase in square footage compared to the Proposed Project. An overall 50% increase in the intensity of new uses is assumed for this alternative. This alternative also assumes that primary access to the HBFC campus would be from Visa Del Sol, as with the Proposed Project. Accessible secondary/emergency/delivery access would be limited to Betty Ford Way within the Eisenhower Medical Center Campus.

Alternative B would make more effective use of the substantial land area within the HBFC campus and could result in better economies of scale when compared to the Proposed Project or Alternative A. HBFC might realize enhanced operational efficiencies from a larger facility as well. The following table summarizes Alternative B.

Table 3-2
HBFC PDP Project – More Intense Alternative B

Building Name	Existing No. of Beds	Alt. B No. of Beds	Existing Sq. Ft.	Alt. B Sq. Ft.	Change Sq. Ft. (+/-)
Fisher Hall	20		12,818	0	(12,818)
Pocklington Hall	20		12,894	0	(12,894)
McCallum Hall	20		12,988	0	(12,988)
DuPont (North) Hall	20		12,994	0	(12,994)
Cork Family Pavilion	-		11,968	11,968	-
Firestone Hall	-		17,662	17,662	-
Residential Building #1	**-**	**69**	**-**	**46,500**	**46,500**
Residential Building #2	**-**	**69**	**-**	**46,500**	**46,500**
Daniels Building	**-**		**-**	**-**	
Office Spaces			25,606	25,606	-
Conference Rooms			10,975	10,975	-
Ottenstein Hall	20	20	14,700	14,700	-
West Building			4,595	4,595	
Day Treatment Bldg.					
Administrative Space				**6,399**	**6,399**
Day Treatment Functions		**66**		**24,523**	**24,523**
Totals	**100**	**224**	**137,200**	**209,428**	**72,228**

3.1.5. Alternative C – "No Project" Alternative

The No Project alternative would maintain the status quo on the subject property. The overall intensity of development and operations would remain largely as they exist today. Sole HBFC campus access would continue to be via John Sinn Road and the internal EMC roadway network. Emergency/secondary access would also be limited to that currently available from within the EMC campus, rather than from an adjoining public street. Currently vacant HBFC lands between Vista Del Sol and the developed portion of the subject property would remain so, and roadway and parkway improvements associated with Proposed Project and Alternative 2 would not be constructed and would remain as they are today. Importantly, the level of services available at the HBFC campus would be limited to today's capacity and facilities.

3.1.6. Other Alternatives Considered But Not Further Analyzed

Pursuant to CEQA Guidelines 15262.6(c), an EIR should also identify any alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process and briefly explain the reasons underlying the lead agency's determination. The following project alternatives were considered by the City, but were not further analyzed because it was determined they would not meet one or more of the project objectives.

Alternative Location Scenario

The Betty Ford Center was founded in the late 1970s, and its first building opened on the present site in 1982 immediately east of the campus of Eisenhower Medical Center. Hazelden joined with the Betty Ford Center in 2014 to form the Hazelden Betty Ford Foundation (HBFF). The first building at the EMC campus opened in 1972. Since its inception, HBFC has had a close and integral relationship with EMC and has expanded its capabilities to today's level of site and program development.

Given the significant investment that has been made by the HBFF and the close professional and utilitarian relationships the HBFC and with Eisenhower Medical Center, an alternative site scenario is not practicable and does not meet the objectives of the subject PDP Project. Therefore, this alternative has not been analyzed.

Alternative Campus Site Plan

The redistribution of uses and buildings on the HBFC campus was also given consideration in light of the existing and future residential uses that surround the site on the north beyond the EMC campus (Rancho Mirage Country Club) and the south (Wilshire Palms and a large-lot single family subdivision). Lands east of Vista Del Sol are also planned for low density residential development on large (1 acre minimum) lots. As noted, the distribution of uses and the siting of buildings was established in the early 1980s and included the construction of backbone utilities and other infrastructure.

Potentially desirable elements of alternative site planning are already incorporated in the proposed Project plan, which places new two-story residential buildings in the center of the campus where their impacts on surrounding lands is minimized. This orientation of buildings away from site boundaries and toward the interior of the campus also serves to buffer the HBFC from surrounding land uses. The proposed day-treatment building would be placed approximately 100 feet west of the west edge of Vista Del Sol. In light of the existing constraints and opportunities at the site, major modifications in the campus site plan did not appear to be feasible. The location of the proposed Vista Del Sol entry is largely dictated by the need to connect to the main interior roadway network and existing parking facilities. The scale and treatment of the proposed entry in the proposed Project did not warrant alternative design or location evaluations.

3.2. Alternative Projects Analysis Summary

As noted, this section analyses the environmental categories and thresholds set forth in Appendix G of the CEQA Guidelines. First, the existing conditions are briefly summarized and reference made to the corresponding Section 2 discussion where more detail is a provided. Then, each impact threshold is cited and the effects of each of the three alternatives briefly analyzed. Impacts mitigation is then briefly discussed, as is an assessment of the environmentally superior alternative.

3.3 Aesthetics

3.3.1 Introduction

This section of the EIR analyzes the potential aesthetic impacts associated with the three proposed alternatives. Aesthetics resources include scenic vistas, scenic resources of the natural and man-made environment, the visual character of the areas surrounding the proposed alternatives, and light and glare of surrounding areas. The analysis also considers the visual simulations provided in Exhibits 2.3-1 through 2.3-1F and the Existing Site Lighting Photometric Plan[1] described in Section 2.3.

3.3.2 Existing Conditions

The Coachella Valley is characterized by contrasting natural vistas consisting of a low-lying desert valley surrounded by the high terrain of several mountain ranges. The valley floor slopes gently from northwest to southeast, from the San Gorgonio Pass on the west at approximately 2,600 feet above mean sea level, to the Salton Sea on the east with a surface elevation of approximately 236 feet below mean sea level. The highest peaks in the region are northwest of the valley: San Jacinto Peak in the San Jacinto Mountains with an elevation of 10,804 feet, and San Gorgonio Peak in the San Bernardino Mountains with an elevation of 11,502 feet. The Santa Rosa Mountains, south and southeast of the subject property, include Toro Peak at 8,717 feet and Santa Rosa Peak at about 8,000 feet. North and east of the Project site are the Indio Hills with elevations rising to about 1,600 feet. All of these natural landforms create dramatic scenery and viewsheds that are visible in the Project planning area and are highly valued.

The subject property is located on the valley floor on rolling stabilized sand dunes. The existing scenic environment on and in the vicinity of the subject property is characterized by large expanses of urbanized lands that include the Eisenhower Medical Center campus, master planned residential communities (Rancho Mirage Country Club and Wilshire Palms), smaller large-lot subdivisions, and vacant 5± acre lots on the east and west sides of Vista Del Sol. Mountain are visible from some locations, the most prominent of which are views of the Santa Rosa Mountains to the south. Lighting at the EMC and HBFC campuses and nearby homes is visible. Vista Del Sol is partially graded and constructed; some vacant properties contain dumping of debris, including construction wastes.

3.3.3 Alternatives Impact Analysis

Would the project:

a) Have a substantial adverse effect on a scenic vista?

Alternative A (Less Intense)

Less Than Significant. Exhibits 2.3-1 through 2.3-1F show that the proposed Project would have a limited and less than significant impact on existing viewsheds as seen from surrounding residential properties and public rights-of-way. Existing views of the distant mountain ranges would remain largely unaffected by the Project.

Alternative A would result in demolition of the same buildings as the proposed Project, and construction of the same new buildings with the same locations, heights, and *fewer square feet* than the proposed Project. Impacts to scenic vistas, therefore, can be expected to be comparable to, but somewhat less than (due to reduced building mass), those of the Project. Impacts would be less than significant.

[1] "Existing Site Lighting Photometric Plan," prepared by RTM Engineering Consultants, January 2020.

Alternative B (More Intense)

Less Than Significant. Exhibits 2.3-1 through 2.3-1F show that the proposed Project would have a limited and less than significant impact on existing viewsheds as seen from surrounding residential properties and public rights-of-way. Existing views of the distant mountain ranges would remain largely unaffected by the Project.

Alternative B would result in demolition and construction of the same buildings as the proposed Project; new buildings would be ±39,304 square feet larger than under the proposed Project, but their locations, heights, and overall designs would be the same as the proposed Project. Impacts to scenic vistas, therefore, would be expected to be comparable to those of the Project. Impacts would be less than significant.

Alternative C (No Project)

No Impact. Alternative C represents a continuation of existing conditions on the subject property. Scenic vistas onsite and in the surrounding area would remain unchanged. No impact would occur.

b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

Alternative A (Less Intense)

No Impact. Alternative A would occur on the same site as the proposed Project. Much of the subject property and land in the vicinity has been converted to urban uses. Undeveloped land is comprised of a common desert floor landform of sand fields, dunes, and hummocks. Scenic resources include mountain vistas; however, they are distant and interrupted by elements of the built environment, including buildings and infrastructure, such as street lights. There are no distinctive trees, rocky outcroppings, historic buildings, or designated scenic highways on the subject site or in the planning area. No impact would occur.

Alternative B (More Intense)

No Impact. Alternative B would occur on the same site as the proposed Project. Much of the subject property and land in the vicinity has been converted to urban uses. Undeveloped land is comprised of a common desert floor landform of sand fields, dunes, and hummocks. Scenic resources include mountain vistas; however, they are distant and interrupted by elements of the built environment, including buildings and infrastructure, such as street lights. There are no distinctive trees, rocky outcroppings, historic buildings, or designated scenic highways on the subject site or in the planning area. No impact would occur.

Alternative C (No Project)

No Impact. Alternative C represents the continuation of existing conditions on the subject property. No demolition, construction, or other development activities would occur. No scenic resources are onsite, and damage to scenic resources would occur.

c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

Alternative A (Less Intense)

Less Than Significant. The existing visual character of the area is largely urbanized with single- and multi-story buildings, parking lots, urban landscaping, lighting fixtures, and roadway improvements. Some undeveloped parcels are northeast, east, and southeast of the subject property and along Vista Del Sol.

Alternative A would alter already developed portions of the HBFC campus and develop approximately 6.5 acres of largely vacant campus lands west of Vista Del Sol. However, proposed improvements would not substantially degrade the existing visual character or quality of public views. Limited portions of existing and proposed improvements would be visible from Vista Del Sol and from a vacant residential lot immediately south of the campus expansion area. Exhibits 2.3-1C, 2.3-1D, and 2.3-1E show that buildings elevations and styles would be consistent with other development in the planning area and elsewhere in the City, and that proposed improvements would not block mountain views or otherwise substantially degrade the existing visual character of the planning area. Although the exhibits were prepared for the proposed Project, they are also applicable to Alternative A which proposes the same buildings with fewer square feet.

Like the proposed Project, Alternative A would be consistent with the standards and guidelines of the Eisenhower Medical Center Specific Plan, which serves as the zoning ordinance for the subject property, as well as General Plan policies pertaining to building setbacks, preservation of mountain views, enhanced landscaping, and other policies governing scenic quality. Impacts would be less than significant.

Alternative B (More Intense)

Less Than Significant. As described above, the existing visual character of the area is largely urbanized with single- and multi-story buildings, parking lots, urban landscaping, lighting fixtures, and roadway improvements. Some undeveloped parcels are northeast, east, and southeast of the subject property and along Vista Del Sol.

Alternative B would alter already developed portions of the HBFC campus and develop approximately 6.5 acres of largely vacant campus lands west of Vista Del Sol. However, proposed improvements would not substantially degrade the existing visual character or quality of public views. Limited portions of existing and proposed improvements would be visible from Vista Del Sol and from a vacant residential lot immediately south of the campus expansion area. Exhibits 2.3-1C, 2.3-1D, and 2.3-1E show that buildings elevations and styles would be consistent with other development in the planning area and elsewhere in the City, and that proposed improvements would not block mountain views or otherwise substantially degrade the existing visual character of the planning area. Although the exhibits were prepared for the proposed Project, they are also applicable to Alternative B which proposes the same buildings with more square feet.

Like the proposed Project, Alternative A would be consistent with the standards and guidelines of the Eisenhower Medical Center Specific Plan, which serves as the zoning ordinance for the subject property, as well as General Plan policies pertaining to building setbacks, preservation of mountain views, enhanced landscaping, and other policies governing scenic quality. Impacts would be less than significant.

Alternative C (No Project)

No Impact. Under Alternative C, no demolition or construction would occur. The existing visual character of the area and quality of public views onsite and in the surrounding area would remain the same as current conditions. No impact would occur.

d) Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?

Alternative A (Less Intense)

Less Than Significant. Alternative A would eliminate lighting from buildings being demolished, but would generate new sources of light and glare, including streetlights, parking lot lighting, on-building security lighting, pedestrian-level lighting, additional vehicles accessing the site, and reflective surfaces, such as windows and some building materials. Parking lot and security lighting needs to meet minimum levels for safety but will be limited in extent and intensity. Reflective glare would be reduced through the use of building canopies and sunscreens.

Alternative A would be expected to generate less light and glare than the proposed Project because it proposes fewer square feet of building space, no new access driveway between the HBFC campus and Vista Del Sol, and no improvements to Vista Del Sol. A detailed lighting plan would be required to show the type, size, and location of a full range of lighting fixtures to demonstrate that lighting would comply with City standards, including protection of the night sky. Impacts would be less than significant.

Alternative B (More Intense)

Less Than Significant. Alternative B would eliminate lighting from buildings being demolished, but would generate new sources of light and glare, including streetlights, parking lot lighting, on-building security lighting, pedestrian-level lighting, additional vehicles accessing the site, and reflective surfaces, such as windows and some building materials. Parking lot and security lighting needs to meet minimum levels for safety but will be limited in extent and intensity. Reflective glare would be reduced through the use of building canopies and sunscreens.

Alternative B would be expected to generate more light and glare than the proposed Project because it proposes more square feet of building space. Lighting associated with the new access driveway and Vista Del Sol improvements would be the same as the proposed Project. A detailed lighting plan would be required to show the type, size, and location of a full range of lighting fixtures to demonstrate that lighting would comply with City standards, including protection of the night sky. Impacts would be less than significant.

Alternative C (No Project)

No Impact. Alternative C would result in no new impacts associated with light and glare. Lighting levels and fixtures would remain the same as current conditions. No impact would occur.

3.3.4 Mitigation Measures

Although Alternatives A and B would result in less than significant impacts to visual resources in the planning area, the same mitigation measures recommended for the proposed Project in Section 2.3.7 (AES-1 through AES-7) are recommended to further ensure impacts are less than significant.

No mitigation measures would be required for Alternative C.

3.3.5 Environmental Superior Alternative

Alternative C, the No Project Alternative, would be the environmentally superior alternative because it would result in no impacts to aesthetic resources; visual resources would remain in their current condition. Of the "build" alternatives, Alternative A would be the environmentally superior alternative because it would result in the smallest new buildings (least square footage), thereby reducing visual impacts associated with building mass, lighting, and glare. Additionally, no new access driveway or Vista Del Sol improvements would be built, and no associated visual impacts would occur.

3.4 Air Quality

3.4.1 Introduction

The following section analyzes the potential air quality impacts associated with the proposed Project alternatives. A variety of local and regional data and information, ranging from research and analysis conducted for the Project site, to regional-scale planning and environmental documents, have been used in researching and analyzing the project alternatives and their potential effects on air quality. An Air Quality and Greenhouse Gas Report was prepared for the proposed Project and alternatives and is provided in Appendix B of this EIR.

3.4.2 Existing Conditions

The Project area is located within the Salton Sea Air Basin (SSAB) and is within the jurisdiction of the South Coast Air Quality Management District (SCAQMD). Air quality in the Salton Sea Air Basin has been impacted by emissions associated with increased development, population growth, and vehicle emissions. Although air pollution is emitted locally from various sources, some of the degradation of air quality within the Salton Sea Air Basin can be attributed to sources located outside of the basin. In the project area, air quality is regulated by the SCAQMD, which implements applicable state and federal policy and regulations.

Please see Section 2.4 for a detailed description of the regulatory framework and existing air quality conditions relating to the Project site.

3.4.3 Alternatives Impact Analysis

a) Conflict with or obstruct implementation of the applicable air quality plan?

Alternative A (Less Intense)

No Impact. All development within the SSAB, including Alternative A, is subject to the 2016 SCAQMD Air Quality Management Plan and 2003 PM_{10} Coachella Valley State Implementation Plan (CVSIP). These comprehensive plans establish control strategies and guidance on regional emission reductions for air pollutants.

Alternative A is consistent with the land use designations within the City's General Plan Land Use Map for *Hospital*. Alternative is also located within the boundaries of the Eisenhower Medical Center Specific Plan, which serves as the zoning ordinance for the subject property. Alternative A is an expansion of capital improvements allowed under the City General Plan and the EMC Specific Plan. Therefore, it is expected that Alternative A will result in emissions consistent with those anticipated in the 2016 AQMP.

In addition, Alternative A would not result in a significant impact on population, as employees of the HBFC expansion, primarily the new day treatment center, are expected to be residents of the City and region. Therefore, Alternative A is consistent with the population forecasts considered within the AQMP and the SCAG 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy.

Alternative A would be implemented in accordance with all applicable air quality management plans to ensure impacts to air quality are reduced to the greatest extent possible. Actions include, but are not limited to, the preparation of a standard dust control management plan in compliance with the CVSIP, and the enforcement of mitigation measures in the event that criteria pollutant thresholds are exceeded during construction activities.

In conclusion, Alternative A is consistent with the intent of the AQMP and will not conflict with or obstruct implementation of the applicable air quality plan. Impacts of the proposed Project and Alternative A are virtually the same as they relate to consistency with the AQMP. No impact is anticipated.

Alternative B (More Intense)

No Impact. Alternative B would result in similar impacts discussed under Alternative A and the proposed Project.

Alternative B is consistent with the land use designations within the City's General Plan Land Use Map for *Hospital* and is an expansion of capital improvements allowed under the City General Plan and the EMC Specific Plan. Therefore, it is expected that Alternative B will result in emissions consistent with those anticipated in the 2016 AQMP.

In addition, Alternative B would not result in a significant impact on population, as employees of the HBFC expansion, primarily the new day treatment center, are expected to be residents of the City and region. Therefore, Alternative B is consistent with the population forecasts considered within the AQMP and the SCAG 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy.

Alternative B would be implemented in accordance with all applicable air quality management plans to ensure impacts to air quality are reduced to the greatest extent possible. Actions include, but are not limited to, the preparation of a standard dust control management plan in compliance with the CVSIP, and the enforcement of mitigation measures in the event that criteria pollutant thresholds are exceeded during construction activities.

In conclusion, Alternative B is consistent with the intent of the AQMP and will not conflict with or obstruct implementation of the applicable air quality plan. Impacts of the proposed Project and Alternative B are virtually the same as they relate to consistency with the AQMP. No impact is anticipated.

Alternative C (No Project)

No Impact. Under Alternative C, existing conditions would remain and there would be no net increase in temporary or permanent air quality impacts. Therefore, Alternative C would no conflict with or obstruct implementation of an applicable air quality plan.

b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?

Alternative A (Less Intense)

Less than Significant with Mitigation. Buildout of Alternative A will result in the direct and indirect generation and emission of air pollutants during construction and operation. The California Emissions Estimator Model (CalEEMod), version 2016.3.2, was used to estimate potential air pollutant emissions associated with Alternative A. CalEEMod output tables are provided in Appendix B of this EIR.

Construction Emissions
Similar to the Project, it was assumed that Alternative A would be built out in three phases over the course of four years. For analysis purposes, construction of the entire project, including all components of Alternative A, is assumed to be continuous and will occur over a 2.5-year period starting in early-2021 with buildout in mid-2023.

Alternative A construction data are listed below and have been applied to the CalEEMod software.

- Building demolition: 51,694 square feet (same as proposed Project)
- Grading material net export: 26,217 cubic yards (same as proposed Project)
- Material hauling distance: currently unknown, assumed 20-mile radius (same as proposed Project)
- Project-specific construction equipment list (same as proposed Project, see Appendix B)
- Construction of new residential halls, day care facilities, and amenities: 123 beds, 101,000 square feet. (less intense than proposed Project)
- New asphalt and concrete: 87,129 square feet. (same as proposed Project)

The following table describes pollutant emissions during construction of Alternative A. Data represent maximum daily emissions expected over the 2.5-year buildout period.

Table 3.4-1
Construction Emissions Summary - Alternative A
(lbs./day)

	CO	NO_x	ROG	SO_x	PM_{10}	$PM_{2.5}$
Max. Daily Emissions[1]	91	25	37	0	4	2
SCAQMD Threshold[2]	**550**	**100**	**75**	**150**	**150**	**55**
Exceeds Threshold	**No**	**No**	**No**	**No**	**No**	**No**

Source: CalEEMod Version 2016.3.2. See Appendix B for detailed tables. Value shown represents the average emissions of summer and winter outputs (rounded numbers).
1. Emissions with adherence to standard dust control measures and SCAQMD requirements for Tier 4 engines and low VOC/ROG coatings.
2. Source: "SCAQMD Air Quality Significance Thresholds" prepared by SCAQMD.

As shown in the table above, SCAQMD daily thresholds for CO, NO_x, ROG, SOx, PM_{10} and $PM_{2.5}$ will not be exceeded during construction of Alternative A. Similar to the proposed Project, adherence to standard dust control measures and SCAQMD requirements for Tier 4 engines and low VOC/ROG coatings (AQ-1, -3, and -4) will ensure impacts will be less than significant.

Operational Emissions

Operational emissions are those released over the long-term life of the project. They include emissions generated by area, energy, and mobile sources. Area sources include consumable products, such as building maintenance and cleaning supplies, kitchen and restroom supplies, pavement off-gassing, and periodic reapplication of architectural coatings. Energy sources include the direct and indirect use of fossil fuels for energy, including natural gas and electricity use in buildings, parking lot lighting, ventilation equipment, and elevators. Mobile emissions are generated by motor vehicle trips.

Buildout of Alternative A is anticipated to occur in late 2024. The following project data was applied to the CalEEMod software to determine operational emissions.

- New residential halls, day care facilities, and amenities: 123 beds, 101,000 square feet. (less intense than proposed Project)
- Office/administration/conference space: 49,677 square feet (same as proposed Project)
- Traffic trip rate: Hospital daily trip rate based on 12/11/19 traffic counts; Office daily trip rate based on Traffic Report, ITE 10th Edition. Hospital = 8.87 trips per bed; Office = 9.74 trip per 1,000 square feet. (same as proposed Project)

The following table identifies the operational criteria pollutant emissions of the existing HBFC versus Alternative A. The difference in emission projections provides the overall net impacts of the renovations and expansion of the HBFC per Alternative A. As shown in the table, Alternative A-generated operational emissions will not exceed

SCAQMD thresholds for any criteria pollutant, and impacts will be less than significant.

Table 3.4-2
Operational Emissions Summary - Alternative A
(lbs./day)

	CO	NO_x	ROG	SO_x	PM_{10}	$PM_{2.5}$
Existing Operation	*39*	*31*	*8*	*0*	*8*	*2*
Alternative A Operation	*34*	*25*	*7*	*0*	*9*	*3*
Net Difference	**-5**	**-6**	**-1**	**0**	**+1**	**+1**
SCAQMD Threshold*	**550**	**100**	**75**	**150**	**150**	**55**
Exceeds Threshold	**No**	**No**	**No**	**No**	**No**	**No**

Source: CalEEMod Version 2016.3.2. See Appendix B for detailed tables. Value shown represents the average emissions of summer and winter outputs.
* Source: "SCAQMD Air Quality Significance Thresholds" prepared by SCAQMD.

Health Impacts

Alternative A will not exceed criteria pollutant emissions thresholds during construction or operation. With today's technology, it is not scientifically possible to calculate the degree to which exposure to various levels of criteria pollutant emissions will impact an individual's health. There are several factors that make predicting a project-specific numerical impact difficult:

- Not all individuals will be affected equally due to medical history. Some may have medical pre-dispositions and diet and exercise levels tend to vary across a population.
- Due to the dispersing nature of pollutants and transient nature of vehicles (the primary emission source), it is difficult to locate and identify which group of individuals will be impacted, either directly or indirectly.
- There are currently no approved methodologies or studies to base assumptions on, such as baseline health levels.

On-site health risks associated with criteria pollutants are expected to be less than significant because the project is not located in proximity to a major roadway and will not be directly be exposed to concentrated vehicle emissions. Due to the limitations described above, the extent to which the Alternative A poses a health risk is uncertain but unavoidable. It is anticipated that health impacts will be less than significant overall, due to the minimal construction and operational emissions.

Cumulative Contribution: Non-Attainment Criteria Pollutants

A significant impact could occur if the project would make a considerable cumulative contribution to federal or State non-attainment pollutants. The Coachella Valley portion of the SSAB is classified as a "non-attainment" area for PM_{10} and ozone. Cumulative air quality analysis is evaluated on a regional scale (rather than a neighborhood scale or city scale, for example) given the dispersing nature of pollutant emissions and aggregate impacts from surrounding jurisdictions and air management districts. Any development project or activity resulting in emissions of PM_{10}, ozone, or ozone precursors will contribute, to some degree, to regional non-attainment designations of ozone and PM_{10}.

The SCAQMD does not currently recommend quantified analyses of construction and/or operational emissions from multiple development projects nor provides methodologies or thresholds of significance to be used to assess the significance of cumulative emissions generated by multiple cumulative projects. However, it is recommended that a project's potential contribution to cumulative impacts should be assessed utilizing the same significance criteria as those for project-specific impacts. Furthermore, SCAQMD states that if an individual development project generates less than significant construction or operational emissions, then the development project would not generate a cumulatively considerable increase in emissions for those pollutants for which the Basin is in nonattainment.

As shown in the tables above, Alternative A-related PM_{10} emissions are projected to be well below established SCAQMD thresholds. Emissions will be further reduced through implementation of Mitigation Measure AQ-1 which requires implementation of a Dust Control Plan in accordance with SCAQMD Rule 403.1. Therefore, Alternative A will result in incremental, but not cumulatively considerable, impacts on regional PM_{10} levels.

CO, NO_x, and ROG are precursors to ozone, for which the Coachella Valley is in non-attainment. As shown in Table 3.4-2, Alternative A will not exceed thresholds for these pollutants. Emissions will be further reduced through implementation of Mitigation Measure AQ-4, which requires that all construction equipment meet or exceed the California Air Resources Board (CARB) and U.S. Environmental Protection Agency (USEPA) Tier 4 off-road emissions standards for equipment rated at 50 horsepower or greater during construction. Also, ROG emissions would be reduced through implementation of AQ-3, which requires that all architectural coatings adhere to the low VOC content standards per SCAQMD Rule 1113. Therefore, Alternative A will result in incremental, but not cumulatively considerable, impacts on regional PM_{10} levels.

Alternative B (More Intense)

Less than Significant with Mitigation. Buildout of Alternative B will result in the direct and indirect generation and emission of air pollutants during construction and operation. The California Emissions Estimator Model (CalEEMod), version 2016.3.2, was used to estimate potential air pollutant emissions associated with Alternative B. CalEEMod output tables are provided in Appendix B of this EIR.

Construction Emissions
Similar to the Project, it was assumed that Alternative B would be built out in three phases over the course of four years. For analysis purposes, construction of the entire project, including all components of Alternative B, is assumed to be continuous and will occur over a 2.5-year period starting in early-2021 with buildout in mid-2023.

Alternative B construction data are listed below and have been applied to the CalEEMod software.

- Building demolition: 51,694 square feet (same as proposed Project)
- Grading material net export: 26,217 cubic yards (same as proposed Project)
- Material hauling distance: currently unknown, assumed 20-mile radius (same as proposed Project)
- Project-specific construction equipment list (same as proposed Project, see Appendix B)
- Construction of new residential halls, day care facilities, and amenities: 224 beds, 159,761 square feet. (more intense than proposed Project)
- New asphalt and concrete, including both on-site and improvements along Vista Del Sol: 87,129 square feet. (same as proposed Project)

The following table describes pollutant emissions during construction of Alternative B. Data represent maximum daily emissions expected over the 2.5-year buildout period.

Table 3.4-3
Construction Emissions Summary - Alternative B
(lbs./day)

	CO	NO_x	ROG	SO_x	PM_{10}	$PM_{2.5}$
Max. Daily Emissions[1]	93	26	51	0	4	2
SCAQMD Threshold[2]	**550**	**100**	**75**	**150**	**150**	**55**
Exceeds Threshold	**No**	**No**	**No**	**No**	**No**	**No**

Source: CalEEMod Version 2016.3.2. See Appendix B for detailed tables. Value shown represents the average emissions of summer and winter outputs (rounded numbers).
1. Emissions with adherence to standard dust control measures and SCAQMD requirements for Tier 4 engines and low VOC/ROG coatings.
2. Source: "SCAQMD Air Quality Significance Thresholds" prepared by SCAQMD.

As shown in the table above, SCAQMD daily thresholds for CO, NO_x, ROG, SOx, PM_{10} and $PM_{2.5}$ will not be exceeded during construction of Alternative B. Similar to the proposed Project, adherence to standard dust control measures and SCAQMD requirements for Tier 4 engines and low VOC/ROG coatings (AQ-1, -3, and -4) will ensure impacts will be less than significant.

Operational Emissions

Operational emissions are those released over the long-term life of the project. They include emissions generated by area, energy, and mobile sources. Area sources include consumable products, such as building maintenance and cleaning supplies, kitchen and restroom supplies, pavement off-gassing, and periodic reapplication of architectural coatings. Energy sources include the direct and indirect use of fossil fuels for energy, including natural gas and electricity use in buildings, parking lot lighting, ventilation equipment, and elevators. Mobile emissions are generated by motor vehicle trips.

Buildout of Alternative B is anticipated to occur in late 2024. The following project data was applied to the CalEEMod software to determine operational emissions.

- New residential halls, day care facilities, and amenities: 224 beds, 159,761 square feet. (more intense than proposed Project)
- Office/administration/conference space: 49,677 square feet (same as proposed Project)
- Traffic trip rate: Hospital daily trip rate based on 12/11/19 traffic counts; Office daily trip rate based on Traffic Report, ITE 10th Edition. Hospital = 8.87 trips per bed; Office = 9.74 trip per 1,000 square feet. (same as proposed Project)

The following table identifies the operational criteria pollutant emissions of the existing HBFC versus Alternative B. The difference in emission projections provides the overall net impacts of the renovations and expansion of the HBFC per Alternative B. As shown in the table, Alternative B-generated operational emissions will not exceed SCAQMD thresholds for any criteria pollutant, and impacts will be less than significant.

Table 3.4-4
Operational Emissions Summary - Alternative B
(lbs./day)

	CO	**NO_x**	**ROG**	**SO_x**	**PM_{10}**	**$PM_{2.5}$**
Existing Operation	*39*	*31*	*8*	*0*	*8*	*2*
Alternative B Operation	*56*	*39*	*10*	*0*	*15*	*4*
Net Difference	**+17**	**+8**	**+2**	**0**	**+7**	**+2**
SCAQMD Threshold*	**550**	**100**	**75**	**150**	**150**	**55**
Exceeds Threshold	**No**	**No**	**No**	**No**	**No**	**No**

Source: CalEEMod Version 2016.3.2. See Appendix B for detailed tables. Value shown represents the average emissions of summer and winter outputs.
* Source: "SCAQMD Air Quality Significance Thresholds" prepared by SCAQMD.

Health Impacts

Alternative B will not exceed criteria pollutant emissions thresholds during construction or operation. With today's technology, it is not scientifically possible to calculate the degree to which exposure to various levels of criteria pollutant emissions will impact an individual's health. There are several factors that make predicting a project-specific numerical impact difficult:

- Not all individuals will be affected equally due to medical history. Some may have medical pre-dispositions and diet and exercise levels tend to vary across a population.

- Due to the dispersing nature of pollutants and transient nature of vehicles (the primary emission source), it is difficult to locate and identify which group of individuals will be impacted, either directly or indirectly.
- There are currently no approved methodologies or studies to base assumptions on, such as baseline health levels.

On-site health risks associated with criteria pollutants are expected to be less than significant because the project is not located in proximity to a major roadway and will not be directly be exposed to concentrated vehicle emissions. Due to the limitations described above, the extent to which Alternative B poses a health risk is uncertain but unavoidable. It is anticipated that health impacts will be less than significant overall, due to the minimal construction and operational emissions.

Cumulative Contribution: Non-Attainment Criteria Pollutants

A significant impact could occur if the project would make a considerable cumulative contribution to federal or State non-attainment pollutants. The Coachella Valley portion of the SSAB is classified as a "non-attainment" area for PM_{10} and ozone. Cumulative air quality analysis is evaluated on a regional scale (rather than a neighborhood scale or city scale, for example) given the dispersing nature of pollutant emissions and aggregate impacts from surrounding jurisdictions and air management districts. Any development project or activity resulting in emissions of PM_{10}, ozone, or ozone precursors will contribute, to some degree, to regional non-attainment designations of ozone and PM_{10}.

The SCAQMD does not currently recommend quantified analyses of construction and/or operational emissions from multiple development projects nor provides methodologies or thresholds of significance to be used to assess the significance of cumulative emissions generated by multiple cumulative projects. However, it is recommended that a project's potential contribution to cumulative impacts should be assessed utilizing the same significance criteria as those for project-specific impacts. Furthermore, SCAQMD states that if an individual development project generates less than significant construction or operational emissions, then the development project would not generate a cumulatively considerable increase in emissions for those pollutants for which the Basin is in nonattainment.

As shown in the tables above, Alternative B-related PM_{10} emissions are projected to be well below established SCAQMD thresholds. Emissions will be further reduced through implementation of Mitigation Measure AQ-1 which requires implementation of a Dust Control Plan in accordance with SCAQMD Rule 403.1. Therefore, Alternative B will result in incremental, but not cumulatively considerable, impacts on regional PM_{10} levels.

CO, NO_x, and ROG are precursors to ozone, for which the Coachella Valley is in non-attainment. As shown in Table 3.4-4, Alternative B will not exceed thresholds for these pollutants. Emissions will be further reduced through implementation of Mitigation Measure AQ-4, which requires that all construction equipment meet or exceed the California Air Resources Board (CARB) and U.S. Environmental Protection Agency (USEPA) Tier 4 off-road emissions standards for equipment rated at 50 horsepower or greater during construction. Also, ROG emissions would be reduced through implementation of AQ-3, which requires that all architectural coatings adhere to the low VOC content standards per SCAQMD Rule 1113. Therefore, Alternative B will result in incremental, but not cumulatively considerable, impacts on regional PM_{10} levels.

Alternative C (No Project)

Less than Significant Impact. Under Alternative C, the existing HBFC campus would continue to operate under current conditions. While typical operations currently produce area, mobile, and energy emissions, these emissions would not increase or be considered cumulatively considerable under Alternative C. Therefore, there will be no new emissions and impacts will be less than significant.

c) Expose sensitive receptors to substantial pollutant concentrations?

Alternative A (Less Intense)

Less than Significant Impact. Similar to the proposed Project, the LST Mass Rate Look-Up tables for SRA 30 at a distance of 25 meters were used to determine if Alternative A would have the potential to generate significant adverse localized air quality impacts during construction.

The following table shows that LST thresholds are not expected to be exceeded for any criteria pollutant during construction. Because the proposed land uses under Alternative A do not include major stationary polluters (such as a landfill, chemical plant, oil field, refineries, etc.), LST analysis was not conducted or required for operation. Therefore, impacts to sensitive receptors from construction of Alternative A will be less than significant.

Table 3.4-5
Localized Significance Thresholds - Alternative A
(lbs./day)

	CO	NO_x	PM_{10}	$PM_{2.5}$
Construction	91	25	4	2
LST Threshold	2,292	304	14	8
Exceed?	No	No	No	No

Source of Emission Data: CalEEMod Version 2016.3.2, see Appendix B.
Source of LST Threshold: LST Mass Rate Look-up Table, 25 meters, 5 acres, SCAQMD.

Alternative B (More Intense)

Less than Significant Impact. Similar to the proposed Project, the LST Mass Rate Look-Up tables for SRA 30 at a distance of 25 meters were used to determine if Alternative B would have the potential to generate significant adverse localized air quality impacts during construction.

The following table shows that LST thresholds are not expected to be exceeded for any criteria pollutant during construction. Because the proposed land uses under Alternative B do not include major stationary polluters (such as a landfill, chemical plant, oil field, refineries, etc.), LST analysis was not conducted or required for operation. Therefore, impacts to sensitive receptors from construction of Alternative B will be less than significant.

Table 3.4-6
Localized Significance Thresholds - Alternative B
(lbs./day)

	CO	NO_x	PM_{10}	$PM_{2.5}$
Construction	93	26	4	2
LST Threshold	2,292	304	14	8
Exceed?	No	No	No	No

Source of Emission Data: CalEEMod Version 2016.3.2, see Appendix B.
Source of LST Threshold: LST Mass Rate Look-up Table, 25 meters, 5 acres, SCAQMD.

Alternative C (No Project)

No Impact: Under Alternative C, there would be no construction impacts and the existing land uses do not include major stationary polluters (such as a landfill, chemical plant, oil field, refineries, etc.). Therefore, there will be no impacts to sensitive receptors.

d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Alternative A (Less Intense)

Less than Significant with Mitigation. Similar to the proposed Project, Alterative A has the potential to result in short-term odors associated with operation of heavy equipment during grading, excavation, and other construction activities. However, construction-related odors would be temporary and quickly dispersed below detectable levels as distance from the construction area increases. During operation, odors may be emitted from residential kitchens; however, all existing and proposed facilities would be equipped with proper ventilation systems to effectively remove grease, smoke, and other odors. Similar to the proposed Project, potential odors associated with Alternative A will be further reduced through implementation of Mitigation Measure AQ-3, which requires nuisance odor abatement per SCAQMD Rule 402. Impacts associated with odors will be less than significant. Alternative A is not expected to result in other emissions adversely affecting a substantial number of people.

Alternative B (More Intense)

Less than Significant with Mitigation. Similar to the proposed Project, Alterative B has the potential to result in short-term odors associated with operation of heavy equipment during grading, excavation, and other construction activities. However, construction-related odors would be temporary and quickly dispersed below detectable levels as distance from the construction area increases. During operation, odors may be emitted from residential kitchens; however, all existing and proposed facilities would be equipped with proper ventilation systems to effectively remove grease, smoke, and other odors. Similar to the proposed Project, potential odors associated with Alternative B will be further reduced through implementation of Mitigation Measure AQ-3, which requires nuisance odor abatement per SCAQMD Rule 402. Impacts associated with odors will be less than significant. Alternative B is not expected to result in other emissions adversely affecting a substantial number of people.

Alternative C (No Project)

No Impact. Under Alternative C, there would be no expansion project and the HBFC campus would remain as is. There would be no increase in construction or operational activities that would result in odors or other emissions that could adversely affect a substantial number of people.

3.4.4 Mitigation Measures

Similar to the proposed Project, all build alternatives would be subject to Mitigation Measures AQ-1 through AQ-4, which require compliance with standard requirements identified by SCAQMD serve to reduce construction-related air emissions. No additional mitigation measures are required. (See Section 2.4.7 for list of Mitigation Measures).

3.4.5 Environmental Superior Alternative

Of the three "build" alternatives, Alternative A (Less Intense) is the environmentally superior project, emitting less criteria pollutants than the other two build alternatives.

3.5 Biological Resources

3.5.1 Introduction

This section evaluates potential biological resource impacts that would result from implementation of Project alternatives. The Project site is located in the Coachella Valley at the western edge of the Colorado subunit of the Sonoran Desert. The unique geographic setting and climate has shaped the evolution of many diverse and occasionally highly specialized plant and wildlife species as well as natural communities. A wide range of common and sensitive plant and animal species are reported in this region.

3.5.2 Existing Conditions

The Project site consists of the currently developed Hazelden Betty Ford Center campus and adjacent undeveloped HBFC lands on the east, which have been disturbed by roadway and utility development, dirt roads and limited dumping of primarily construction-related waste. The Project site is located in an area of the City of Rancho Mirage that has seen incremental development since the 1960s, including institutional and residential development. Lands to the east and north consist of vacant parcels both east and west of Vista Del Sol with varying levels of site disturbance. Biological resources in the Project area have been affected by upwind development that has cut off the sand transport system that maintained the dune habitat on these lands. Local habitat has also been highly fragmented by urban development and is in the process of being subdivided for one-acre residential estates along Vista Del Sol. Native habitat on the subject property retains native soils and is sparsely vegetated with a desert scrub community dominated by creosote bush (*Larrea tridentata*) and annual plants. The Project site is within the boundaries of the CVMSHCP/NCCP but is not within any designated Conservation Area.

Please see Section 2.5.4 and Section 2.5.5 for a detailed description of existing biological conditions.

3.5.3 Alternatives Impact Analysis

a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service.

Alternative A (Less Intense)

Less Than Significant with Mitigation. The Alternative A development scenario would result in substantially the same impacts as are associated with the proposed Project. The extent of site disturbance and habitat loss will be the same. As discussed in Section 2.5, the subject property is located within the CVMSHCP planning area and the Proposed PDP Project is a "Covered Activity" as defined by the CVMSHCP. As a "Covered Activity", potential project impacts to covered species have been accounted for and will be offset through payment of development impact fees for land disturbances that post-date 1996. The "Less Intense" Alternative A would result in fewer additional patient beds and less overall square footage; it would still be a "Covered Activity" as defined by the CVMSHCP.

Biological resources in the project area have been affected by extensive urban development that has cut off the sand dunes and hummocks from the sand transport ecological process that created the original habitat. The construction of area roadways, golf courses and other development have also greatly fragmented and eliminated native blowsand habitat in this area of the valley. Native habitat has been eliminated from all but the eastern undeveloped portion of the subject property, which retains native soils and sparse vegetation of the desert scrub community dominated by widely spaced creosote bush (*Larrea tridentata*) and annuals, as well as the aforementioned invasive Russian thistle and other non-native plants.

Based on site reconnaissance and existing conditions on site and in the vicinity, literature review of previous on-site surveys and recent surveys in the Project vicinity, known biological resources in the Project area and the site's location adjacent to a local roadway, Alternative A has minimal potential to impact sensitive biological resources. With the implementation of pre-construction nesting bird surveys during nesting season (see Mitigation Measure BIO-2 & BIO-3 in Section 2.5), it will not have a substantial effect on sensitive plant or wildlife species, federally listed species, or state species of concern, or their habitats.

Alternative B (More Intense)

Less Than Significant with Mitigation. The Alternative B development scenario would result in substantially the same impacts as are associated with the proposed Project. The extent of site disturbance and habitat loss will be the same. As discussed in Section 2.5, the proposed improvements would occur within the CVMSHCP planning area and the subject Project is a "Covered Activity" as defined by the CVMSHCP. As a "Covered Activity", potential project impacts to covered species have been accounted for and will be offset through payment of development impact fees for land disturbances that post-date 1996. With the implementation of pre-construction nesting bird surveys during nesting season (see Mitigation Measure BIO-2 & BIO-3 in Section 2.5), it will not have a substantial effect on sensitive plant or wildlife species, federally listed species, or state species of concern, or their habitats.

Alternative C (No Project)

No Impact. Alternative C will result in the continuation of existing conditions. There will be no new adverse effect, either directly or indirectly, or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service. No impact would occur.

b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service.

Alternative A (Less Intense)

Less Than Significant. The habitat of the vacant portions of the subject property and the surrounding vacant lands is comprised of the desert creosote scrub community, which is the most common habitat community in the Coachella Valley. It is widespread across the valley floor and on alluvial fans throughout the valley. There are no riparian or other sensitive habitat types on the subject property or in the vicinity. The Alternative A development scenario would result in substantially the same impacts as are associated with the proposed Project. The type and extent of site disturbance and habitat loss will be the same. Alternative A would result in less than significant impacts to riparian and other sensitive habitats.

Alternative B (More Intense)

Less Than Significant. As with the proposed Project and Alternative A, the "More Intense" Alternative B would have comparable impacts on sensitive habitats. The habitat of the vacant portions of the subject property and the surrounding vacant lands is comprised of the desert creosote scrub community, which is the most common habitat community in the Coachella Valley. It is widespread across the valley floor and on alluvial fans throughout the valley. There are no riparian or other sensitive habitat types on the subject property or in the vicinity. The Alternative B development scenario would result in substantially the same impacts as are associated with the proposed Project. The type and extent of site disturbance and habitat loss will be the same. Alternative B would result in less than significant impacts to riparian and other sensitive habitats.

Alternative C (No Project)

No Impact. Alternative C will result in the continuation of existing conditions. There will be no adverse effect on any riparian habitat or other sensitive natural community or habitat identified in local or regional plans, policies, or regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service. No impact would occur.

c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.

Alternative A (Less Intense)

No Impact. Potential U.S. Army Corps of Engineers (USACE) and California Department of Fish and Wildlife (CDFW) jurisdictional waters and wetlands within the City are limited to drainages within and adjacent to the Santa Rosa Mountains to the south of the City of Rancho Mirage. Portions of the Whitewater River stormwater channel and tributaries would also be considered under USACE jurisdiction. The Project site is not located near or within the vicinity of any of these potential wetland areas. Therefore, the "Less Intense" Alternative A would have no impact on federally protected wetlands.

Alternative B (More Intense)

No Impact. As discussed above, the Project site is not located near or in the vicinity of any of these potential wetland areas. Therefore, the "More Intense" Alternative B would have no impact on state or federally protected wetlands.

Alternative C (No Project)

No Impact. Alternative C will result in the continuation of existing conditions. The Project site is not located near or in the vicinity of any of these potential wetland areas. No impact would occur.

d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.

Alternative A (Less Intense)

Less Than Significant. Impacts associated with Alternative A would essentially be the same as those associated with the proposed Project. Primary movement and/or wildlife corridors in the area are limited to drainages and foothills of the Indio Hills and the Santa Rosa Mountains, Whitewater River Stormwater Channel and various canyons and drainages to the south. The project site is not located within or adjacent to a known wildlife corridor, being located within an urban environment largely surrounded by developed and previously disturbed lands. While portions of the site and vicinity may be used by migratory bird species protected under the MBTA, coyotes and perhaps other mammals. However, due to surrounding human activity over many years, including vehicular traffic, off-road vehicle use and neighborhood pets, the site no longer contains features suitable for a migratory wildlife corridor nor does the site connect desert lands, being bounded by urban development on all sides except the east. Potential impacts to nesting birds will be assessed and proper measures taken to avoid and minimize impacts pursuant to the MBTA (Mitigation Measure BIO-2 & BIO-3); however, given the context and existing conditions at the subject property, Alternative A will not impede the use of a native wildlife nursery site. Impacts are expected to be less than significant on species movement, migratory corridors or native wildlife nursery sites.

Alternative B (More Intense)

Less Than Significant. As with Alternative A, impacts associated with Alternative B would essentially be the same as those associated with the proposed Project. As discussed above, the subject property is not located within or adjacent to a known wildlife corridor. Due to surrounding human activity over many years, the site no longer contains features that are suitable for a migratory wildlife corridor. Potential impacts to nesting birds will be assessed and proper measures taken to avoid and minimize impacts pursuant to the MBTA (Mitigation Measure BIO-2 & BIO-3). However, given the largely urban context and existing conditions at the subject property, Alternative B will not impede the use of a native wildlife nursery site. Impacts are expected to be less than significant on species movement, migratory corridors or native wildlife nursery sites.

Alternative C (No Project)

No Impact. Alternative C will result in the continuation of existing conditions. The existing campus is not located within or adjacent to a known wildlife corridor. Given the largely urban context and existing conditions at the subject property, Alternative C will not impede the use of a native wildlife nursery site. No impact would occur.

e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.

Alternative A (Less Intense)

No Impact. Impacts associated with Alternative A would essentially be the same as those associated with the proposed Project. Alternative A will not interfere with any City policies regarding the preservation of plants or animals. The City is a "Permittee" under the Coachella Valley MSHCP. Alternative A would be a "Covered Activity" under the CVMSHCP and development mitigation fees will be collected prior to new ground disturbance to mitigate for potential project impacts and to further the implementation of the CVMSHCP.

Alternative B (More Intense)

No Impact. As with Alternative A, impacts associated with Alternative B would essentially be the same as those associated with the proposed Project. Alternative B will not interfere with any City policies regarding the preservation of plants or animals. Alternative B would be a "Covered Activity" under the CVMSHCP and development mitigation fees will be collected prior to new ground disturbance to mitigate for potential project impacts and to further the implementation of the CVMSHCP.

Alternative C (No Project)

No Impact. Alternative C will result in the continuation of existing conditions, and will not interfere with any City policies regarding the preservation of plants or animals.

f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

Alternative A (more Intense)

No Impact. The City of Rancho Mirage is a participant in the CVMSHCP, and Alternative A will adhere to the requirements of the Plan. As proposed, Alternative A would be a "Covered Activity" under the CVMSHCP and thus does not conflict with the CVMSHCP.

Alternative B (More Intense)

No Impact. The City of Rancho Mirage is a participant in the CVMSHCP, and Alternative B will adhere to the requirements of the Plan. As proposed, Alternative B would be a "Covered Activity" under the CVMSHCP and thus does not conflict with the CVMSHCP.

Alternative C (No Project)

No Impact. Alternative C will result in the continuation of existing conditions, and will not conflict with the CVMSHCP.

3.5.4 Mitigation Measures

As with the proposed Project, the mitigation measures set forth in Section 2.5 of this EIR will be effective at reducing potential impacts of build Alternatives A and B to less than significant levels.

3.5.5 Environmental Superior Alternative

With regard to potential impacts on biological resources, Alternative C (No Project) is superior to the three "build" alternatives. The three "build" alternatives, the proposed Project and Alternatives A and B would result in the same level of impacts because the same land and area (the subject property) will be disturbed.

3.6 Cultural and Tribal Cultural Resources

3.6.1 Introduction

This section provides an evaluation of potential cultural and tribal resource impacts that would result from implementation of Project alternatives. The Project site is located on the desert floor of the Coachella Valley, which has been home to Native Americans for millennia. Scattered cultural resources have been reported throughout the valley and are most frequently associated with areas with year-round and seasonal food sources and other ethnobotanical resource areas, lithic workshops, and trails. The potential impacts to these resources are discussed below and where needed, mitigation measures are set forth.

3.6.2 Existing Conditions

A cultural resources survey and report were prepared for the Proposed Project by CRM TECH (2019)[1], which serves as the basis for much of the following discussion. No cultural resources were identified within or in proximity to the Project site in the historical records search and background research. The field survey identified one potential historical resource, a foundation left by a demolished residence built in the 1950s and recorded into the California Historical Resources Inventory and designated Site 33-029012 (CA-RIV-012964) by the EIC. However, Site 33-029012 does not appear eligible for listing in the California Register of Historical Resources, and thus does not meet CEQA's definition of a "historical resource." No other potentially sensitive cultural resources were found during the Project site survey (also see Section 2.6.4 and 2.6.5 of this EIR).

Consultation with local Native American tribes and the Native American Heritage Commission did not yield specific information on Native American cultural resources, including sacred lands, in the Project area. Five of the eleven tribes contacted during the AB 52 consultation and in response to the EIR Notice of Preparation responded in writing, requesting tribal monitoring during construction, notification upon discovery of tribal resources, and a cultural resources survey and copies of relevant documentation.

Please see Section 2.6.4 and Section 2.6.5 for a detailed description of existing cultural and tribal resources conditions.

3.6.3 Alternatives Impact Analysis

Cultural Resources

a) Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5.

Alternative A (Less Intense)

No Impact. Alternative A would disturb the same lands (subject property) as the proposed Project. As discussed in Section 2.6.5, no "historical resources" or archaeological resources are present within the Project area. Only one potential historical resource (Site 33-029012 (CA-RIV-012964)) was found on the Project site. It consists of concrete pad remains from common mid-20th century residences in the desert region, and it was determined that the site would not be considered a "historical resource" pursuant to CEQA § 15064.5. All existing buildings, structures, and other features at the Betty Ford Center are modern in origin, dating only to the 1982-2002 era, and none of them demonstrates any outstanding merits in design, construction, engineering, or aesthetics. Therefore, Alternative A would have no impact on the significance of any historical resource in the Project area.

[1] "Historical/Archaeological Resources Survey: The Hazelden Betty Ford Center Reconfiguration Project", prepared by CRM TECH, December 14, 2019.

Alternative B (More Intense)

No Impact. Alternative B would disturb the same lands (subject property) as the Proposed Project. As discussed in Section 2.6.5 and above, no "historical resources" or archaeological resources pursuant to CEQA § 15064.5 are present within the Project area. Therefore, Alternative B would have no impact on the significance of any historical resource in the Project area.

Alternative C (No Project)

No Impact. Alternative C will result in the continuation of existing conditions. There will be no adverse effect on the significance of any historical resource in the Project area.

b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5.

Alternative A (Less Intense)

Less than Significant with Mitigation. No archaeological resources were observed during the site-specific cultural resources field survey nor recorded during previous surveys. The Project site is located on the valley floor of the Coachella Valley in an area that does not harbor lithic or subsistence resources that would have been important to local bands of Native Americans. The area is also subject to erosive winds and sand deposition which will have removed any evidence of aboriginal trails across these lands. The Project site is not located within a culturally sensitive area. Should any archaeological resource be encountered during construction, implementation of Mitigation Measure CUL-1 will ensure appropriate procedures are followed and the impacts would be reduced to a less than significant level.

Alternative B (More Intense)

Less than Significant with Mitigation. As discussed above, no archaeological resources were observed during the site-specific cultural resources field survey nor recorded during previous surveys. The Project site is not located within a culturally sensitive area and is unlikely to harbor lithic or subsistence resources that would have been important to local bands of Native Americans. Should any archaeological resource be encountered during construction, implementation of Mitigation Measure CUL-1 will ensure appropriate procedures are followed and the impacts would be reduced to a less than significant level.

Alternative C (No Project)

No Impact. Alternative C will result in the continuation of existing conditions. There will be no adverse effect on the significance of any archaeological resource in the Project area.

c) Disturb any human remains, including those interred outside of dedicated cemeteries.

Alternative A (Less Intense)

Less than Significant with Mitigation. It is not anticipated that any human remains will be encountered during construction of Alternative A on the subject property. Most of the Project site and much of the surrounding area have been previously disturbed to accommodate development. Past and current site conditions make the discovery of human remains very unlikely. Should any human remains be encountered during site excavation, California Health and Safety Code Section 7050.5 requires that all excavation stop, and that the County coroner inspect the site. Should the remains be identified as Native American by the coroner, the NAHC is required to contact the most likely descendant, and that descendant may recommend appropriate burial. This requirement, reflected in Mitigation Measure CUL-2, will assure that impacts associated with human remains are less than significant.

Alternative B (More Intense)

Less than Significant with Mitigation. As discussed in Section 2.6.6 and above, it is not anticipated that any human remains will be encountered during construction of Alternative B on the subject property. Should any human remains be encountered during site excavation, California Health and Safety Code Section 7050.5 requires that all excavation stop, and that the County coroner inspect the site. This requirement and appropriate procedures described in Mitigation Measure CUL-2 will assure that impacts associated with human remains are less than significant.

Alternative C (No Project)

No Impact. Alternative C will result in the continuation of existing conditions. There will be no adverse effect on disturbance of human remains in the Project area.

Tribal Cultural Resources

a) Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or

Alternative A (Less Intense)

No Impact. Alternative A will not impact a tribal historic resource that is listed or eligible for listing in the California Register of Historical Resources or in a local register of historical resources because none were identified or known to occur on the subject property. As explained in 3.6.3.a) above, the site-specific cultural resources survey determined that the Project site contains no historical or tribal cultural resources pursuant to CEQA § 15064.5. The Proposed Project area is not identified by the City of Rancho Mirage as an historic site or landmark. No impact will occur.

Alternative B (More Intense)

No Impact. Alternative B will not impact a tribal historic resource that is listed or eligible for listing in the California Register of Historical Resources or in a local register of historical resources because none were identified or known to occur on the subject property. As explained in 3.6.3.a) above, the site-specific cultural resources survey determined that the Project site contains no historical or tribal cultural resources pursuant to CEQA § 15064.5. The Proposed Project area is not identified by the City of Rancho Mirage as an historic site or landmark. No impact will occur.

Alternative C (No Project)

No Impact. Alternative C will result in the continuation of existing conditions. There will be no adverse effect on any historical or tribal cultural resources in the Project area.

ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

Alternative A (Less Intense)

Less than Significant with Mitigation. Alternative A would disturb the same land and area (subject property) as the proposed Project. AB 52 requires that the consultation process between local and tribal governments begin prior to the release of an environmental impact report, negative declaration, or mitigated negative declaration. On December 12, 2019, the City of Rancho Mirage distributed AB 52 consultation letters for the proposed Project to 11 Native American tribes identified by the NAHC as having traditional lands or cultural places within City boundaries. Commenting tribes are listed in Section 2.6.6 and include the Agua Caliente Band of Cahuilla Indians, Torres-Martinez Desert Cahuilla, Twenty-Nine Palms Band of Mission Indians and others. Copies of tribal comments are provided in Appendix A.

During the EIR Notice of Preparation comment period, written responses were received from five tribes. Copies of the tribal responses are provided in Appendix A. These comments, which are described in detail in Section 2.6.6 and reproduced in Appendix A, included requests for additional information in the Draft EIR, opportunity to review cultural reports prepared for this Project, notification of any resource discovery as a consequence of site development, and opportunities to monitor ground disturbing activities.

No tribal cultural resources are known to exist on the Project site. Tribal representatives indicated they were unaware of the occurrence of any tribal cultural resources on the Project site, and as discussed in Section 2.6.6.b-c), the location and past and present conditions result in low potential for discovery of any tribal cultural or archaeological resources, although the site is within the Traditional Use Area of the Cahuilla tribes. With implementation of Mitigation Measures CUL-1 and CUL-2, potential impacts to archaeological resources of significance to Native American tribes would be less than significant.

Alternative B (More Intense)

Less than Significant with Mitigation. Alternative B would disturb the same land and area (subject property) as the Proposed Project. Based on the AB 52 consultation process described above and the cultural resource assessment conducted for the Project, no tribal cultural resources are known or expected to exist on the Project site. Tribal representatives indicated that the site does not contain any tribal cultural resources, and as discussed in Section 2.6.6.b-c), the location and past and present conditions indicate a low potential for discovery of any cultural or archaeological resources, although the site is within the Traditional Use Area of the Cahuilla tribes. With implementation of Mitigation Measures CUL-1 and CUL-2, potential impacts to archaeological resources of significance to Native American tribes would be less than significant.

Alternative C (No Project)

No Impact. Alternative C will result in the continuation of existing conditions. There will be no adverse effect on any tribal cultural or historical resources in the Project area.

3.6.4 Mitigation Measures

As with the Proposed Project, the mitigation measures set forth in Section 2.6.7 of this EIR will be effective at reducing potential impacts of build Alternatives A and B to less than significant levels.

3.6.5 Environmental Superior Alternative

None of the two build alternatives would result in significant impacts to cultural or tribal resources after mitigation. However, Alternative C (No Project) is superior to Alternative A and Alternative B because Alternative C would have the least potential, if any, to disturb previously undiscovered cultural or tribal resources.

3.7 Geology and Soil

3.7.1 Introduction

This section of the EIR analyzes the potential impacts to the Project alternatives based on regional and local geology and soils. The HBFC Project is located within Coachella Valley, a rift valley associated with the San Andreas Fault System in Southern California. In the region, there are numerous earthquake-producing faults, including the San Andreas Fault Zone.[1] Regional soils range from rocky outcrops within the mountains bordering the valley to coarse gravels of mountain canyons and recently laid fine- and medium-grained alluvial (stream deposited) and aeolian (wind deposited) sediments on the central valley floor. The valley consists of a diverse range of rocks and sediments, which were formed or deposited over millions of years and provide important details about the geologic history of the region.

3.7.2 Existing Conditions

Due to its complex tectonic settings, the Coachella Valley and the Project area are highly susceptible to seismic activity and associated geologic hazards. Seismicity in this region is mainly associated with the San Andreas Fault Zone and San Jacinto Fault Zone.[2] The Project site is near the Banning Branch, Southern segment, and the Coachella Segment (aka Mission Creek Branch) of the San Andreas Fault.

Please see Section 2.7.4 and Section 2.7.5 for a detailed description of existing geotechnical conditions.

3.7.3 Alternatives Impact Analysis

a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

Alternative A (Less Intense)

No Impact. Alternative A would be located on the same land (subject property) as the proposed Project. The Project site is not located within an Alquist-Priolo Earthquake Fault Zone, and there are no known active or potentially active faults in the Project area or within the immediate vicinity. The nearest major active fault is the San Andreas Fault – Banning Branch, located approximately 5.9 miles northeast of the subject property and capable of generating a maximum probable quake of 7.2 Richter scale. Given its proximity to the subject site, moderate to severe ground shaking is considered the primary geologic hazard that could affect the site. Based on its location with respect to active faults and being outside any Alquist-Priolo Earthquake Fault Zone, impact related to fault-related ground rupture is not anticipated.

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1 Sieh, K., & Williams, P. L. (1990). Behavior of the southernmost San Andreas fault during the past 300 years. Sharp, R. V. (1967). San Jacinto fault zone in the Peninsular Ranges of southern California. *Geological Society of America Bulletin*, *78*(6), 705-730.

2 Nicholson, C. (1996). Seismic Behavior of the Southern San Andreas fault Zone in the Northern Coachella Valley, California: Comparison of the 1948 and 1986 Earthquake Sequences. Bulletin of the Seismological Society of America, 86(5), 1331-1349.

Alternative B (More Intense)

No Impact. Alternative B would be located on the same land (subject property) as the proposed Project. As discussed above, the Project site is not located within an Alquist-Priolo Earthquake Fault Zone, and there are no known active or potentially active faults in the Project area or within the immediate vicinity. Impact related to fault-related ground rupture is not anticipated.

Alternative C (No Project)

No Impact. Alternative C will result in the continuation of existing conditions. As discussed above, the existing campus (part of the subject property) is not located within an Alquist-Priolo Earthquake Fault Zone, and there are no known active or potentially active faults in the area or within the immediate vicinity. Impact related to fault-related ground rupture is not anticipated.

ii) Strong seismic ground shaking?

Alternative A (Less Intense)

Less than Significant with Mitigation. Alternative A would be located on the same land (subject property) as the proposed Project, but subjecting fewer people to potential hazards compared to the proposed Project. As the Project site is located in proximity to the San Andreas Fault, there is a high probability that the Project site will be subject to strong ground shaking in the event of a major earthquake. As discussed in Section 2.7.6 of this EIR, the peak ground acceleration value for the project site was reported to be approximately 0.73g ("g" represents the rate of ground acceleration associated with gravity; 1.0g equals an acceleration of 32 feet per second) based on 2002 CGS/USGS Probabilistic Seismic Hazard Maps. Based upon the adherence of project structural design to applicable seismic and other codes including the California Building Code, the impacts of seismically induced ground shaking on the proposed buildings and structures can be reduced to a less than significant level.

The geotechnical report for the Project site provides specific design recommendations to address ground shaking and potential hazards. Implementation of these recommendations (presented as mitigation measures in Section 2.7.7) would minimize the potential for damage to the proposed buildings and structures in the event of a strong seismic event, and this impact would be less than significant with mitigation.

Alternative B (More Intense)

Less than Significant with Mitigation. Alternative B would be located on the same land (subject property) as the proposed Project, but subjecting more people to potential hazards compared to the proposed Project. As discussed in Section 2.7.6 and above, there is a high probability that the Project site will be subject to strong ground shaking in the event of a major earthquake. Based upon the adherence of project structural design to applicable seismic and other codes including the California Building Code, the impacts of seismically induced ground shaking on the proposed buildings and structures can be reduced to a less than significant level.

Implementation of the design recommendations in the geotechnical report (presented as mitigation measures in Section 2.7.7) would minimize the potential for damage to the proposed buildings and structures in the event of a strong seismic event, and this impact would be less than significant with mitigation.

Alternative C (No Project)

No Impact. Alternative C will result in the continuation of existing conditions. No new adverse impact related to strong seismic ground shaking would occur on the Betty Ford Center campus.

iii) Seismic-related ground failure, including liquefaction?

Alternative A (Less Intense)

Less than Significant with Mitigation. Alternative A would be located on the same land (subject property) as the proposed Project, but subjecting fewer people to potential hazards compared to the proposed Project. Ground failure can take the form of liquefaction of underlying soils caused by strong ground shaking and high groundwater, landsliding (see below) and lateral spreading. Lateral spreading is the finite, lateral movement of gently to steeply sloping, saturated soil deposits caused by earthquake-induced liquefaction. No groundwater was found in the borings at about 50 feet below ground surface at the subject property, and groundwater depths are believed to be greater than 100 feet in the area. According to the 2020 geotechnical report update, a State Well located less than ½ mile south of the Project site had groundwater depth readings between 205 and 222 feet below ground surface between October 2011 and December 2019. Therefore, the potential for liquefaction and subsequent lateral spreading to occur on the subject property is negligible due to low ground water levels and the impact would be less than significant.

Alternative B (More Intense)

Less than Significant with Mitigation. Alternative B would be located on the same land (subject property) as the proposed Project, but subjecting more people to potential hazards compared to the proposed Project. As discussed in Section 2.7.6, groundwater was found in the borings at about 50 feet below ground surface at the subject property, and groundwater depths are believed to be greater than 100 feet in the area. Therefore, the potential for liquefaction and subsequent lateral spreading to occur on the subject property is negligible due to low ground water levels and the impact would be less than significant.

Alternative C (No Project)

No Impact. Alternative C will result in the continuation of existing conditions. No new adverse impact related to ground failure would occur on the Betty Ford Center campus.

iv) Landslides?

Alternative A (Less Intense)

No Impact. The City of Rancho Mirage General Plan indicates that potential landslide hazard is primarily located in hillsides and mountainous areas of the City. Alternative A would be located on the same land (subject property) as the proposed Project, but would subject fewer people to potential hazards compared to the proposed Project. The Project is located on the valley floor and within the City's urban core, which is generally flat to gently sloping and substantially developed. There are no known landslides or landslide hazard areas at the site or vicinity, nor is the site in the path of any known landslides. Therefore, no impact is anticipated.

Alternative B (More Intense)

No Impact. Alternative B would be located on the same land (subject property) as the proposed Project, but could subject more people to potential hazards compared to the proposed Project. As discussed above, the Project is located on the valley floor and within the City's urban core, which is generally flat to gently sloping and substantially developed. There are no known landslides or landslide hazard areas at the site or vicinity, nor is the site in the path of any known landslides. Therefore, no impact is anticipated.

Alternative C (No Project)

No Impact. Alternative C will result in the continuation of existing conditions. As discussed above, the Betty Ford Center campus is located on the valley floor and within the City's urban core, which is generally flat to gently sloping and substantially developed. There are no known landslides or landslide hazard areas at the site or vicinity, nor is the site in the path of any known landslides. Therefore, no impact is anticipated.

b) Result in substantial soil erosion or the loss of topsoil?

Alternative A (Less Intense)

Less than Significant with Mitigation. Alternative A would disturb the same lands (subject property) as the proposed Project. The site soils have a very severe susceptibility to wind and water erosion. Construction of the Project may result in the short-term loss of topsoil due to runoff and wind erosion. The Project site grading plans will be required to incorporate preventative measures to reduce soil erosion. A dust control management plan will be required as part of the grading permit to minimize potential impacts caused by blowing dust and sand during and following construction. Procedures set forth in the plan will ensure that potential erosion is controlled during construction. Once completed, the Project area will consist of new structures, paved roads and parking areas, new landscaping and otherwise stabilized surfaces, which will resist erosion. Implementation of the mitigation measures provided in the geotechnical report will ensure the impacts related to soil erosion or loss of topsoil are less than significant (See Section 2.7.7).

Alternative B (More Intense)

Less than Significant with Mitigation. Alternative B would disturb the same lands (subject property) as the proposed Project. As discussed above, construction of the Project may result in the short-term loss of topsoil due to runoff and wind erosion. The Project site grading plans and a dust control management plan will be implemented to minimize soil erosion and loss of topsoil. Once completed, the Project area will consist of new structures, paved roads and parking areas, new landscaping and otherwise stabilized surfaces, which will resist erosion. Implementation of the mitigation measures provided in the geotechnical report will ensure the impacts related to soil erosion or loss of topsoil are less than significant (See Section 2.7.7).

Alternative C (No Project)

No Impact. Alternative C will result in the continuation of existing conditions. No new adverse impact related to soil erosion or the loss of topsoil would occur on the Betty Ford Center campus.

c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on-or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

Alternative A (Less Intense)

Less than Significant with Mitigation. Alternative A would disturb the same lands (subject property) as the proposed Project. Impacts associated with Alternative A would essentially be the same as those associated with the proposed Project. This Project is not located within an area that is susceptible to landslides, lateral spreading, or liquefaction. Collapse is a potential geologic hazard in the Coachella Valley, and can be triggered by excessive irrigation or change of water tables and accelerated by heavy loads on the ground surface (e.g. vehicle/equipment) and cause rapid ground settlement. Ground subsidence associated with ground water extraction has been an issue in the project vicinity and especially in the eastern portion of the Coachella Valley. As discussed in Section 2.7.6, in the eastern

portion of Rancho Mirage in the vicinity of the Whitewater River, the average subsidence rates increased from about 39 millimeters per year (mm/yr), or 0.13 foot per year (ft/yr), during 1995–2000 to about 45 mm/yr (0.15 ft/yr) during 2003–10. At the Project site, subsidence over this period has been very limited.[3]

The potential for seismically induced ground subsidence is considered to be low at the Project site; however, uncompacted fill areas may be susceptible to seismically induced settlement. Building and seismic code requirements assure that the potential impact associated with ground subsidence or collapse is reduced to less than significant levels through conventional site preparation techniques such as over-excavation, moisture conditioning and recompaction.

Alternative A proposes new structures and other improvements that will be constructed in conformance with recommendations of the Project geologist and would not result in unmitigated unstable soils. The site soils are capable of supporting Alternative A, provided the recommendations in the geotechnical report are followed in the Project design and construction. Mitigation measures in Section 2.7.7 below will ensure impacts regarding unstable soils and associated potential hazards are reduced to less than significant levels.

Alternative B (More Intense)

Less than Significant with Mitigation. Alternative B would disturb the same lands (subject property) as the proposed Project. Impacts associated with Alternative B would essentially be the same as those associated with the proposed Project. As discussed above and in Section 2.7.6, the main concerns regarding unstable soil on the Project site would be that uncompacted fill areas may be susceptible to seismically induced settlement and that collapse would be accelerated by heavy loads on the ground surface (e.g. vehicle/equipment) and cause rapid ground settlement. Building and seismic code requirements assure that the potential impacts associated with ground subsidence or collapse are reduced to less than significant levels through conventional site preparation techniques such as over-excavation, moisture conditioning and recompaction.

Alternative B proposes new structures and other improvements that will be constructed in conformance with recommendations of the Project geologist and would not result in unmitigated unstable soils. The site soils are capable of supporting Alternative B, provided the recommendations in the geotechnical report are followed in the Project design and construction. Mitigation measures in Section 2.7.7 below will ensure impacts regarding unstable soils and associated potential hazards are reduced to less than significant levels.

Alternative C (No Project)

No Impact. Alternative C will result in the continuation of existing conditions. No new adverse impact related to unstable soils would occur on the Betty Ford Center campus.

d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?

Alternative A (Less Intense)

No Impact. Alternative A would disturb the same lands (subject property) as the proposed Project. The geotechnical report determined that, based on the cone penetrometer tests performed onsite, the site soils generally consist of sand with silt, silty sand, and some silt and are visually classified to be in the very low expansion category according to the California Building Code. Impacts related to expansive soils are not anticipated.

[3] Ibid.

Alternative B (More Intense)

No Impact. Alternative B would disturb the same lands (subject property) as the proposed Project. As discussed above, the site soils generally consist of sand with silt, silty sand, and some silt and are visually classified to be in the very low expansion category according to the California Building Code. Impacts related to expansive soils are not anticipated.

Alternative C (No Project)

No Impact. Alternative C will result in the continuation of existing conditions. As discussed above, the site soils generally consist of sand with silt, silty sand, and some silt and are visually classified to be in the very low expansion category according to the California Building Code. Impacts related to expansive soils are not anticipated.

e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?

Alternative A (Less Intense)

No Impact. Alternative A would be located in developed area of the city that is served by sanitary sewer. Thus, sewer or wastewater disposal facilities will not be required. No impacts are anticipated.

Alternative B (More Intense)

No Impact. Alternative B would be located in developed area of the city that is served by sanitary sewer. Thus, sewer or wastewater disposal facilities will not be required. No impacts are anticipated.

Alternative C (No Project)

No Impact. Alternative C will result in the continuation of existing conditions. The Betty Ford Center campus is served by the sewer system and not impact would occur related to septic tanks or alternative waste water disposal systems.

f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Alternative A (Less Intense)

Less than Significant with Mitigation. Alternative A would disturb the same lands (subject property) as the proposed Project. Impacts associated with Alternative A would essentially be the same as those associated with the proposed Project. As discussed in Section 2.7.6, the Project site is not known to contain unique paleontological features, and on-site soils have a very low probability of yielding sensitive paleontological resources. Neither does the subject property include any unique geologic features. Nonetheless, construction activities have the potential to reveal Quaternary-age alluvium which has an unknown paleontological resource sensitivity. To further reduce the potential impacts to paleontological resources due to excavation activities, GEO-13 is provided in the Mitigation Measures section below. A qualified paleontologist will be required to evaluate any buried paleontological materials discovered during earth-moving operations at the site to avoid or minimize potential impacts to less than significant levels. There are no unique geological features (rivers, lakes, hills, faults, folds, etc.) that could be directly or indirectly destroyed by Alternative A. No impacts to such features would occur.

Alternative B (More Intense)

Less than Significant with Mitigation. Alternative B would disturb the same lands (subject property) as the proposed Project. Impacts associated with Alternative B would essentially be the same as those associated with the proposed Project. As discussed in Section 2.7.6, the Project site is not known to contain unique paleontological features, and on-site soils have a very low probability of yielding sensitive paleontological resources. Neither does the subject property include any unique geologic features. To further reduce the potential impacts to paleontological resources due to excavation activities, Mitigation Measure GEO-13 is provided in Section 2.7.7. There are no unique geological features (rivers, lakes, hills, faults, folds, etc.) that could be directly or indirectly destroyed by Alternative B. No impacts to such features would occur.

Alternative C (No Project)

No Impact. Alternative C will result in the continuation of existing conditions. No new adverse impact related to unique paleontological resource or site or unique geologic feature would occur on the Betty Ford Center campus.

3.7.4 Mitigation Measures

As with the Proposed Project, the mitigation measures set forth in Section 2.7.7 of this EIR will be effective at reducing potential impacts of build Alternatives A and B to less than significant levels.

3.7.5 Environmental Superior Alternative

With regard to potential impacts related to geotechnical conditions, Alternative C (No Project) is superior to the three "build" alternatives. The three "build" alternatives, the proposed Project and Alternatives A and B would result in the same level of impacts because they would disturb the same lands (the subject property). However, the less intense Alternative A would subject fewer people to potential hazards onsite.

3.8 Greenhouse Gas Emissions

3.8.1 Introduction

The following section analyzes the potential greenhouse gas emission impacts associated with the three proposed Project alternatives. A variety of local and regional data and information, ranging from research and analysis conducted for the project site, to regional-scale planning and environmental documents, have been used in researching and analyzing the project and its potential greenhouse gas impacts. An Air Quality and Greenhouse Gas Report was prepared for the proposed Project and alternatives, and is provided in Appendix B of this EIR.

3.8.2 Existing Conditions

The Project area is located in the Coachella Valley portion of the Salton Sea Air Basin (SAAB or Air Basin). Some air polluting agents are also greenhouse gases, such as carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), and fluorinated gases (hydrofluorocarbons, perfluorocarbons and sulfur hexafluoride), which are released into the atmosphere through natural processes and human activities. These gases are termed greenhouse gases (GHG) due to their shared characteristic of trapping heat. Please see Section 2.8 for a detailed description of existing greenhouse gas emission conditions and regulatory requirements.

3.8.3 Alternatives Impact Analysis

Would the Project:

a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Alternative A (Less Intense)

Less than Significant. Alternative A would generate GHG emissions during construction and operation, as described below.

Construction GHG Emissions
Similar to the proposed Project, construction of Alternative A is anticipated to occur over a four-year period with build out in late-2024. For analysis purposes, all project components have been analyzed concurrently over a 2.5-year period. During construction, fossil fuel used by construction equipment, machinery, haul trucks, and employees' commuter vehicles will generate short-term GHG emissions.

The California Emissions Estimator Model (CalEEMod), version 2016.3.2, was used to estimate Alternative A-related GHG emissions during construction (see Appendix B of this EIR). GHG emissions will be temporary and will end once construction is complete. All components of construction, including equipment, fuels, and materials, will be subject to current regulations for GHGs and equipment efficiency standards, which are meant to reduce GHG emissions.

Alternative A construction data are listed below and have been applied to the CalEEMod software.

- Building demolition: 51,694 square feet (same as proposed Project)
- Grading material next export: 26,217 cubic yards (same as proposed Project)
- Material hauling distance: currently unknown, assumed 20-mile radius (same as proposed Project)
- Project-specific construction equipment list (same as proposed Project, see Appendix B)

- Construction of new residential halls, day care facilities, and amenities: 23 new beds, 18,661 square feet of new day treatment facility (total of 123 beds when combined with existing uses) (less intense than proposed Project)
- New asphalt and concrete: 87,129 square feet. (same as proposed Project)

See Table 3.8-1 for emission results.

Operational GHG Emissions

Buildout of Alternative A is anticipated to occur in late 2024. The following project data was applied to the CalEEMod software to determine operational emissions. The results are shown in Table 3.8-1.

- New residential halls, day care facilities, and amenities: 23 new beds, 18,661 square feet of new day treatment facility (total of 123 beds, 101,000 square feet of treatment/office/amenities when combined with existing uses) (less intense than proposed Project)
- Office/administration/conference space: 49,677 square feet (same as proposed Project)
- Traffic trip rate: Hospital daily trip rate based on 12/11/19 traffic counts and Project Traffic Report; Office daily trip rate based on Traffic Report, ITE 10th Edition. Hospital = 8.87 trips per bed; Office = 9.74 trip per 1,000 square feet. (same as proposed Project)

Similar to the proposed Project, Alternative A GHG emissions were analyzed against the SCAQMD "tiered" test for determining GHG thresholds:

Tier 1: Is there an applicable exemption?
Does Not Comply: Alternative A does not qualify for an applicable exemption under CEQA.

Tier 2: Is the project compliant with a greenhouse gas reduction plan that is, at a minimum, consistent with the goals of AB 32?
Does Not Comply: Although the City of Rancho Mirage has an adopted Sustainability Plan which is consistent with AB 32, Alternative A would not comply with Tier 2 because the Plan is not a CEQA certified document. SCAQMD requires that the "greenhouse gas reduction plan," in this case the Sustainability Plan, have a certified Final CEQA document.

Tier 3: Is the project below an absolute threshold (10,000 MTCO2e/yr for industrial projects; 3,000 MTCO2e/yr for residential and commercial projects)?
Complies: Alternative A is considered a residential/commercial project and is estimated to generate a net emission of 393 MT of CO_2e annually.

Tier 4: Is the project below a (yet to be set) performance threshold?
Does Not Comply: There are currently no performance thresholds applicable to Alternative A to measure against.

Tier 5: Would the project achieve a screening level with off-site mitigation?
Does Not Comply: Off-site mitigation is not proposed.

Table 3.8-1
Alternative A Greenhouse Gas Emissions Summary

	Existing Conditions	Proposed Project MT CO_2e/Yr	Alternative A MT CO_2e/Yr
Construction[1]	--	*2,811*	*2,787*
Operation	--	*4,247*	*3,558*
Amortized Construction Emissions[2]	--	*94*	*93*
Operation at Buildout plus Amortized Construction Emissions	**3,258**	**4,341**	**3,651**
Tier 3 (3,000 MT/yr) Threshold			**+393 (Net Alt. A vs Existing Conditions)**

Source: CalEEMod Version 2016.3.2. See Appendix B for detailed tables. Values shown represent the total unmitigated GHG emission projections for operation of the proposed Project under two scenarios.
1. Construction GHG emissions are the total combined emissions from 2021-2023.
2. Buildout construction GHG emissions were amortized over 30 years then added to buildout operational GHG emissions. 2,811/30 = 94; 2,787/30 =93

The emission data shows that overall operational emissions associated with Alternative A would be slightly higher than existing conditions due to the higher number of beds and mobile trips, as expected. Overall, Alternative A emissions would be lower than the proposed Project emissions due to the "less intense" nature of buildout. As shown in the table above, Alternative A would result in the net increase of 393 $MTCO_2e$/yr and will not exceed SCAQMD GHG emission thresholds. Therefore, Alternative A impacts related to direct or indirect GHG emissions are considered less than significant.

Alternative B (More Intense)

Less than Significant. Alternative B would generate GHG emissions during construction and operation, as described below.

Construction GHG Emissions
Similar to the proposed Project, construction of Alternative B is anticipated to occur over a four-year period with build out in late-2024. For analysis purposes, all project components have been analyzed concurrently over a 2.5-year period. During construction, fossil fuel used by construction equipment, machinery, haul trucks, and employees' commuter vehicles will generate short-term GHG emissions.

The California Emissions Estimator Model (CalEEMod), version 2016.3.2, was used to estimate Alternative B-related GHG emissions during construction (see Appendix B of this EIR). GHG emissions will be temporary and will end once construction is complete. All components of construction, including equipment, fuels, and materials, will be subject to current regulations for GHGs and equipment efficiency standards, which are meant to reduce GHG emissions.

Alternative B construction data are listed below and have been applied to the CalEEMod software.

- Building demolition: 51,694 square feet (same as proposed Project)
- Grading material next export: 26,217 cubic yards (same as proposed Project)
- Material hauling distance: currently unknown, assumed 20-mile radius (same as proposed Project)

- Project-specific construction equipment list (same as proposed Project, see Appendix B)
- Construction of new residential halls, day care facilities, and amenities: 124 new beds, 30,922 square feet of new day treatment facility (total of 224 beds, when combined with existing uses) (more intense than proposed Project)
- New asphalt and concrete, including both on-site and improvements along Vista Del Sol: 87,129 square feet. (same as proposed Project)

See Table 3.8-2 for emission results.

Operational GHG Emissions

Buildout of Alternative B is anticipated to occur in late 2024.The following project data was applied to the CalEEMod software to determine operational emissions. The results are shown in Table 3.8-2.

- New residential halls, day care facilities, and amenities: 224 beds, 30,922 square feet. (more intense than proposed Project)
- Office/administration/conference space: 49,677 square feet (same as proposed Project)
- Traffic trip rate: Hospital daily trip rate based on 12/11/19 traffic counts and Project Traffic Report; Office daily trip rate based on Traffic Report, ITE 10th Edition. Hospital = 8.87 trips per bed; Office = 9.74 trip per 1,000 square feet. (same as proposed Project)

Similar to the proposed Project, Alternative B GHG emissions were analyzed against the SCAQMD "tiered" test for determining GHG thresholds:

Tier 1: Is there an applicable exemption?
Does Not Comply: Alternative B does not qualify for an applicable exemption under CEQA.

Tier 2: Is the project compliant with a greenhouse gas reduction plan that is, at a minimum, consistent with the goals of AB 32?
Does Not Comply: Although the City of Rancho Mirage has an adopted Sustainability Plan which is consistent with AB 32, Alternative B would not comply with Tier 2 because the Plan is not a CEQA certified document. SCAQMD requires that the "greenhouse gas reduction plan," in this case the Sustainability Plan, have a certified Final CEQA document.

Tier 3: Is the project below an absolute threshold (10,000 MTCO2e/yr for industrial projects; 3,000 MTCO2e/yr for residential and commercial projects)?
Complies: Alternative B is considered a residential/commercial project and is estimated to generate a net emission increase of 2,498 MT of CO_2e annually.

Tier 4: Is the project below a (yet to be set) performance threshold?
Does Not Comply: There are currently no performance thresholds applicable to Alternative B to measure against.

Tier 5: Would the project achieve a screening level with off-site mitigation?
Does Not Comply: Off-site mitigation is not proposed.

Table 3.8-2
Alternative B Greenhouse Gas Emissions Summary

	Existing Conditions	Proposed Project MT CO_2e/Yr	Alternative B MT CO_2e/Yr
Construction[1]	--	*2,811*	*2,864*
Operation	--	*4,247*	*5,660*
Amortized Construction Emissions[2]	--	*94*	*96*
Operation at Buildout plus Amortized Construction Emissions	**3,258**	**4,341**	**5,756**
Tier 3 (3,000 MT/yr) Threshold			**+2,498 (Net Alt. B vs Existing Conditions)**

Source: CalEEMod Version 2016.3.2. See Appendix B for detailed tables. Values shown represent the total unmitigated GHG emission projections for operation of the proposed Project under two scenarios.
1. Construction GHG emissions are the total combined emissions from 2021-2023.
2. Buildout construction GHG emissions were amortized over 30 years then added to buildout operational GHG emissions. 2,811/30 = 94; 2,864/30 = 96

The emission data shows that overall operational emissions associated with Alternative B would be higher than existing conditions and the proposed Project due to the higher number of beds and mobile trips, as expected. As shown in the table above, Alternative B would result in the net increase of 2,498 $MTCO_2e$/yr from existing conditions, however it will not exceed SCAQMD GHG emission thresholds. Therefore, Alternative B impacts related to direct or indirect GHG emissions are considered less than significant.

Alternative C (No Project)

No Impact. Under Alternative C, existing conditions would remain and there would be no increase in GHG emissions. The existing HBFC campus would continue to operate as usual, and the vacant 6-acre lot to the east would remain vacant. Therefore, Alternative C would result in no impacts related to direct or indirect GHG emissions.

b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

Alternative A (Less Intense)

Less than Significant. All components of construction and operation, including equipment, fuels, materials, and management practices, would be subject to current SCAQMD rules and regulations related to greenhouse gases. Applicable SCAQMD rules include, but are not limited to, source-specific standards that reduce the greenhouse gas content in engines and limit equipment idling durations. Alternative A will also adhere to the required state Low Carbon Fuel Standard for construction equipment and heavy-duty vehicle efficiency standards.

Construction-related GHG emissions will not exceed GHG thresholds for construction because no such thresholds have been established. Similar to the proposed Project, Alternative A complies with the applicable City GHG reduction strategies contained in the City's Sustainability Plan and SCAQMD regulations, and does not exceed the tiered test thresholds for GHG emissions. Therefore, Alternative A would not generate significant levels of GHG emissions, and will not conflict with an applicable plan, policy or regulation adopted for the purpose of reducing GHG emissions. Impacts will be less than significant.

Alternative B (More Intense)

Less than Significant. All components of construction and operation, including equipment, fuels, materials, and management practices, would be subject to current SCAQMD rules and regulations related to greenhouse gases. Applicable SCAQMD rules include, but are not limited to, source-specific standards that reduce the greenhouse gas content in engines and limit equipment idling durations. Alternative B will also adhere to the required state Low Carbon Fuel Standard for construction equipment and heavy-duty vehicle efficiency standards.

Construction-related GHG emissions will not exceed GHG thresholds for construction because no such thresholds have been established. Similar to the proposed Project, Alternative B complies with the applicable City GHG reduction strategies contained in the City's Sustainability Plan and SCAQMD regulations, and does not exceed the tiered test thresholds for GHG emissions. Therefore, Alternative B would not generate significant levels of GHG emissions, and will not conflict with an applicable plan, policy or regulation adopted for the purpose of reducing GHG emissions. Impacts will be less than significant.

Alternative C (No Project)

No Impact. Under Alternative C, existing conditions would remain and there would be no increase in GHG emissions. The existing HBFC campus would continue to operate as usual, and the vacant 6-acre lot to the east would remain vacant. Therefore, Alternative C would not conflict with an applicable plan, policy or regulation adopted for the purpose of reducing GHG emissions.

3.8.4 Mitigation Measures

No project Alternative would exceed GHG thresholds, therefore no mitigation measures are required.

3.8.5 Environmental Superior Alternative

Technically, Alternative C (No Project) is considered the environmentally superior alternative because it will result in no new GHG emissions compared to the proposed Project, Alternative A and Alternative B. However, when comparing build alternatives, Alternative A (Less Intense) in considered environmentally superior because it will emit fewer GHG's during both construction and operation when compared to Alternatives B and the proposed Project.

3.9 Hazards and Hazardous Material

3.9.1 Introduction

This section of the EIR analyzes the potential impacts associated with the use of hazardous materials by the proposed alternatives. The Project site is located in a region where hazardous materials transport, storage, and use is strictly regulated for large quantity users, such as industrial processing plants and commercial dry cleaners. None of the alternatives will involve large quantity users. The City of Rancho Mirage implements regular consultation with the Riverside County Department of Environmental Health, the Fire Department and Regional Water Quality Control Board (RWQCB) to regulate use and transport of hazardous materials. The alternatives' potential impacts are discussed and, where needed, mitigation measures are set forth.

3.9.2 Existing Conditions

A Phase I Initial Site Environmental Assessment (Phase I) was conducted for the Project site to identify any potentially hazardous substances onsite or in the Project vicinity that could impact or be impacted by the proposed Project. The Phase I determined there were no known onsite conditions that posed risk of hazardous materials exposures, or that would warrant regulatory involvement, including actions leading to environmental soil sampling, soil remediation, groundwater sampling, and/or groundwater remediation.[1] Neither did the Phase I study identify any significant up-gradient releases of hazardous materials that could impact the subject property. See Section 2.9.5 Existing Conditions for additional discussion for existing hazards conditions.

3.9.3 Alternatives Impact Analysis

Would the Project:

a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Alternative A (Less Intense)

Less than Significant with Mitigation.

Short-Term Impacts (Construction)
Similar to the proposed Project, the construction of the "less intense" expansion of the HBFC would involve the use, storage, transport, or disposal of some hazardous and flammable substances such as oil, diesel fuel, transmission fluid, or other materials. These materials would be in small quantities, and would likely be in similar quantities to those required for the proposed Project, given the similar scope of the alternative's development. All potentially hazardous materials would be contained, stored, and used in accordance with manufacturers' instructions and handled in compliance with applicable federal, State, and local regulations. Any associated risk would be adequately reduced to a less than significant level through compliance with these standards and regulations.

[1] Phase I Environmental Site Assessment for the Hazelden Betty Ford Center, prepared by Terra Nova Planning and Research, Inc., January 2020.

Alternative A also involves the demolition of the four existing two-story buildings constructed post 1982. While the use of asbestos and lead in new construction ended prior to the construction of these buildings, there remains a limited possibility that either of these hazardous materials may still be found within these buildings. Similar to the proposed Project, Alternative A would be subject to mitigation measure (HAZ-1), which requires a reconnaissance-level survey of these buildings prior to their demolition to ensure that proper methods and protocol are used during demolition and hauling. In this regard, this measure will ensure that these potential impacts can be kept to insignificant levels.

Long-Term Operation
Under Alternative A, the proposed HBFC expansion would involve use of limited quantities of cleaning and degreasing solvents, fertilizers, pesticides, and other materials. As discussed above, the manner in which commercial chemicals are stored and handled is highly regulated by the local Fire Department, County and State. These standard requirements will assure that impacts associated with the use of cleaners and other chemicals in the commercial and residential buildings will be less than significant.

Overall, Alternative A impacts would be marginally lower than those associated with the proposed Project because of the reduced number of total beds and square footage, and would remain less than significant.

Alternative B (More Intense)

Less than Significant with Mitigation.

Short-Term Impacts (Construction)
Similar to the proposed Project, the construction of the "more intense" expansion of the HBFC would involve the use, storage, transport, or disposal of some hazardous and flammable substances such as oil, diesel fuel, transmission fluid, or other materials. These materials would be in small quantities, and would likely be in similar quantities to those required for the proposed Project, given the similar scope of the alternative's development. All potentially hazardous materials would be contained, stored, and used in accordance with manufacturers' instructions and handled in compliance with applicable federal, State, and local regulations. Any associated risk would be adequately reduced to a less than significant level through compliance with these standards and regulations.

Alternative B also involves the demolition of the four existing two-story buildings constructed post 1982. While the use of asbestos and lead in new construction ended prior to the construction of these buildings, there remains a limited possibility that either of these hazardous materials may still be found within these buildings. Similar to the proposed Project, Alternative B would be subject to mitigation measure (HAZ-1), which requires a reconnaissance-level survey of these buildings prior to their demolition to ensure that proper methods and protocol are used during demolition and hauling. In this regard, this measure will ensure that these potential impacts can be kept to insignificant levels.

Long-Term Operation
Under Alternative B, the proposed HBFC expansion would involve use of limited quantities of cleaning and degreasing solvents, fertilizers, pesticides, and other materials. As discussed above, the manner in which commercial chemicals are stored and handled is highly regulated by the local Fire Department, County and State. These standard requirements will assure that impacts associated with the use of cleaners and other chemicals in the commercial and residential buildings will be less than significant.

Overall, Alternative B impacts would be marginally higher than those associated with the proposed Project because of the increased number of total beds and square footage, but would remain less than significant.

Alternative C (No Project)

No Impact. Under Alternative C, the existing HBFC campus would remain and there would be no expansion project and, therefore, no construction related hazard concerns. The existing HBFC campus currently uses limited quantities of cleaning and degreasing solvents, fertilizers, pesticides, and other materials. As discussed above, the manner in which commercial chemicals are stored and handled is highly regulated by the local Fire Department, County and State. These standard requirements currently assure that impacts associated with the use of cleaners and other chemicals are fully mitigated. There will be no new impacts associated with potential hazards to the public.

c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Alternative A (Less Intense)

No Impact. The proposed site is not located within ¼ mile of an existing or proposed school. The nearest school to the project site is the Rancho Mirage Elementary School located approximately 2 miles southwest of the project site. Similar to the proposed Project, Alternative A will not generate hazardous materials, nor will these products be used in the project area. There will be no impact to schools.

Alternative B (More Intense)

No Impact. The proposed site is not located within ¼ mile of an existing or proposed school. The nearest school to the project site is the Rancho Mirage Elementary School located approximately 2 miles southwest of the project site. Similar to the proposed Project, Alternative B will not generate hazardous materials, nor will these products be used in the project area. There will be no impact to schools.

Alternative C (No Project)

No Impact. The proposed site is not located within ¼ mile of an existing or proposed school. The nearest school to the project site is the Rancho Mirage Elementary School located approximately 2 miles southwest of the project site. The existing HBFC campus does not generate hazardous materials, nor will these products be used in the project area. There will be no impact to schools.

d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

Alternative A (Less Intense)

No Impact. There are no hazardous materials or waste sites located on or near the site, as determined in the Phase I assessment. In addition, the proposed site is not included on a list compiled pursuant to Government Code Section 65962.5. Similar to the proposed Project, Alternative A will not create a significant hazard to the public or environment. No impact is anticipated.

Alternative B (More Intense)

No Impact. There are no hazardous materials or waste sites located on or near the site, as determined in the Phase I assessment. In addition, the proposed site is not included on a list compiled pursuant to Government Code Section 65962.5. Similar to the proposed Project, Alternative B will not create a significant hazard to the public or environment. No impact is anticipated.

Alternative C (No Project)

No Impact. There are no hazardous materials or waste sites located on or near the site, as determined in the Phase I assessment. In addition, the proposed site is not included on a list compiled pursuant to Government Code Section 65962.5. The existing HBFC campus will not create a significant hazard to the public or environment. There are currently no impacts.

e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?

Alternative A (Less Intense)

No Impact. The project site is not located within an airport land use plan or private airstrip. Flights approaching and departing the Palm Springs International Airport may fly over the City, but these flights would be more than three miles from the runways and at a high altitude. The EMC helipad is approximately 1,000 feet northwest of the nearest building on the Project site. Refer to Section 3.13 for analysis of noise impacts associated with helicopter operations. There will be no impact.

Alternative B (More Intense)

No Impact. The project site is not located within an airport land use plan or private airstrip. Flights approaching and departing the Palm Springs International Airport may fly over the City, but these flights would be more than three miles from the runways and at a high altitude. The EMC helipad is approximately 1,000 northwest of the nearest building on the Project site. Refer to Section 3.13 for analysis of noise impacts associated with helicopter operations. There will be no impact.

Alternative C (No Project)

No Impact. The project site is not located within an airport land use plan or private airstrip. Flights approaching and departing the Palm Springs International Airport may fly over the City, but these flights would be more than three miles from the runways and at a high altitude. The EMC helipad is approximately 1,000 northwest of the nearest building on the Project site. Refer to Section 3.13 for analysis of noise impacts associated with helicopter operations. There is no impact.

f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Alternative A (Less Intense)

Less than Significant. The proposed site is located within the Eisenhower Medical Center campus and currently has direct access to two minor arterial roadways, Bob Hope Drive and Country Club Drive. Alternative A does not propose an additional access point along Vista Del Sol and, therefore, would not require temporary lane closures, detours or re-routing. Emergency access to HBFC would continue to be provided via a circuitous route through the EMC campus. Therefore, there will be a less than significant impact to the adopted emergency response plan or evacuation plan.

Alternative B (More Intense)

Less than Significant. The proposed site is located within the Eisenhower Medical Center campus and currently has direct access to two minor arterial roadways, Bob Hope Drive and Country Club Drive. Similar to the proposed Project, Alternative B would propose an additional access point along Vista Del Sol, which will provide access to Frank Sinatra Drive and Country Club Drive.

Alternative B will not require temporary lane closures, detours or re-routing. At build out, improved roadway capacity and additional campus access will enhance access for emergency vehicles. Therefore, there will be a less than significant impact to the adopted emergency response plan or evacuation plan.

Alternative C (No Project)

No Impact. Under Alternative C, the existing HBFC campus would remain and there would be no expansion project. Therefore, there will be no impact to an adopted emergency response plan or evacuation plan.

g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

Alternative A (Less Intense)

No Impact. The subject property is not located in a wildland fire hazard area (General Plan, Chapter 8 Safety, Exhibit 27 Fire Threat Map), and Alternative A will not expose people or structures to a significant risk of loss, injury, or death involving wildland fires. Therefore, no impact would occur.

Alternative B (More Intense)

No Impact. The subject property is not located in a wildland fire hazard area (General Plan, Chapter 8 Safety, Exhibit 27 Fire Threat Map), and Alternative B will not expose people or structures to a significant risk of loss, injury, or death involving wildland fires. Therefore, no impact would occur.

Alternative C (No Project)

No Impact. Under Alternative C, the existing HBFC campus would remain as is and there would be no expansion project. The subject property is not located in a wildland fire hazard area (General Plan, Chapter 8 Safety, Exhibit 27 Fire Threat Map), and the existing HBFC campus does not expose people or structures to a significant risk of loss, injury, or death involving wildland fires. Therefore, there is no impact.

3.9.4 Mitigation Measures

Similar to the proposed Project, all build alternatives would be subject to Mitigation Measures HAZ-1, which requires a pre-demolition asbestos inspection of the existing residential halls (see Section 2.9.7 Mitigation Measures). No additional mitigation measures are required.

3.9.5 Environmental Superior Alternative

Overall, Alternative C would be the environmentally superior alternative because it will result in the lowest number of beds and square footage, therefore requiring fewer cleaning supplies and similar materials. In addition, Alternative C would not require the demolition of existing buildings, which has the potential to require asbestos remediation.

Of the three "build" alternatives, Alternative A would be the environmentally superior alternative because it would expose the least amount of people to potential hazards.

3.10 Hydrology and Water Quality

3.10.1 Introduction

This section analyzes the potential impacts of the proposed alternatives to hydrological conditions and water quality.

3.10.2 Existing Conditions

The Project site is located in the Coachella Valley, where mean annual rainfall is very low on the valley floor, ranging from 2 to 4 inches per year and averaging about 5 to 6 inches along the foothills. This region is located within the Whitewater River Hydrologic Unit (HU) and falls under the jurisdiction of the Colorado River Regional Water Quality Control Board (Region 7). The alternatives' potential impacts to these resources are discussed and, where needed, mitigation measures are set forth.

Please see Section 2.10.4 and Section 2.10.5 for a detailed description of existing conditions regarding hydrology and water quality.

3.10.3 Alternatives Impact Analysis

Would the Project:

a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

Alternative A (Less Intense)

Less than Significant with Mitigation. Similar to the proposed Project, the use of construction equipment and other vehicles could result in spills of oil, grease, gasoline, brake fluid, antifreeze, or other vehicle-related fluids and pollutants under this alternative. Improper handling, storage, or disposal of fuels and materials or improper cleaning of machinery could result in accidental spills or discharges that could degrade water quality. Development of Alternative A would result in fewer beds and overall square footage compared to the proposed Project. As a result, the impacts to water quality associated with this alternative would be slightly less, if not similar to those of the proposed Project, and the potential for pollution of receiving waters would be comparable.

As with the proposed Project, a Water Quality Management Plan (WQMP) and construction BMPs would be implemented, consistent with Mitigation Measures HYD-1 and HYD-2, and would be expected to effectively reduce or avoid the discharge of any pollutants of concern that could occur as a result of implementation of this alternative. It is anticipated that implementation of mitigation measures will eliminate the potential of this alternative to substantially degrade surface or groundwater quality. Overall, impacts would be similar to those of the proposed Project, and like the proposed Project, would be reduced to less than significant levels with the implementation of mitigation measures.

Operational Impact
At Alternative A buildout, runoff from the residential halls, day treatment facility and parking lot areas could contain pollutants common in urban runoff. Compared to the proposed Project, the operational impacts to water quality associated with this alternative would be marginally reduced, insofar as the project intensity would be less, and the potential for pollution of receiving waters would be marginally reduced at the site. As with the proposed Project, the alternative's hydrology plan will be designed so that all stormwater is captured onsite to the two proposed retention basins located at the southern portion of the site. Alternative A would also subject to the Whitewater River Region Stormwater Management Plan (SWMP) which regulates activities and programs implemented by the

Permittees to manage urban runoff, and to assure that runoff is managed in compliance with the requirements of the National Pollutant Discharge Elimination System (NPDES) municipal separate storm sewer system permit (MS4 Permit) for the Whitewater River Region. The SWMP is designed to reduce stormwater pollution to the maximum extent practicable and eliminate prohibited non-stormwater discharges through a NPDES municipal stormwater discharge permit. Alternative A would also be subject to WQMP BMPs which would help the site meet the requirements of the MS4 permit.

This alternative is also within the jurisdiction of CVWD which is required to meet water quality requirements in the production and delivery of domestic water and sewage management. Under this alternative, residential and day treatment facilities will connect to existing CVWD water and sewer infrastructure in the project vicinity which will assure that, over the long-term, the project meets RWQCB standards and protects groundwater quality.

Overall, impacts to water quality would be about the same as with the proposed Project, and would be reduced to less than significant levels with the implementation of mitigation measures and standard requirements.

Alternative B (More Intense)

Less than Significant with Mitigation. Similar to the proposed Project, the use of construction equipment and other vehicles could result in spills of oil, grease, gasoline, brake fluid, antifreeze, or other vehicle-related fluids and pollutants under this alternative. Improper handling, storage, or disposal of fuels and materials or improper cleaning of machinery could result in accidental spills or discharges that could degrade water quality. Development of Alternative B would result in an increased number of beds and overall square footage compared to the proposed Project. As a result, the impacts to water quality associated with this alternative would be greater to those of the proposed Project, and the potential for pollution of receiving waters would be slightly increased.

As with the proposed Project, a Water Quality Management Plan (WQMP) and construction BMPs would be implemented, consistent with Mitigation Measures HYD-1 and HYD-2, and would be expected to effectively reduce or avoid the discharge of any pollutants of concern that could occur as a result of implementation of this alternative. It is anticipated that implementation of mitigation measures will eliminate the potential of this alternative to substantially degrade surface or groundwater quality. Overall, although impacts would be greater than those of the proposed Project, impacts would be reduced to less than significant levels with the implementation of mitigation measures.

Operational Impact
At Alternative B buildout, runoff from the residential halls, day treatment facility and parking lot areas could contain pollutants common in urban runoff. Compared to the proposed Project, the operational impacts to water quality associated with this alternative would be marginally increased, insofar as the project intensity would be greater, and the potential for pollution of receiving waters would be increased at the site. As with the proposed Project, the alternative's hydrology plan will be designed so that all stormwater is captured onsite to the two proposed retention basins located at the southern portion of the site. Alternative B would also subject to the Whitewater River Region Stormwater Management Plan (SWMP) which regulates activities and programs implemented by the Permittees to manage urban runoff, and to assure that runoff is managed in compliance with the requirements of the National Pollutant Discharge Elimination System (NPDES) municipal separate storm sewer system permit (MS4 Permit) for the Whitewater River Region. The SWMP is designed to reduce stormwater pollution to the maximum extent practicable and eliminate prohibited non-stormwater discharges through a NPDES municipal stormwater discharge permit. Alternative B would also be subject to WQMP BMPs which would help the site meet the requirements of the MS4 permit.

This alternative is also within the jurisdiction of CVWD which is required to meet water quality requirements in the production and delivery of domestic water and sewage management. Under this alternative, the residential and day treatment facilities will connect to existing CVWD water and sewer infrastructure in the project vicinity which will assure that, over the long-term, the project meets RWQCB standards and protects groundwater quality.

Overall, impacts to water quality would be slightly greater than the proposed Project, and would be reduced to less than significant levels with the implementation of mitigation measures and standard requirements.

Alternative C (No Project)

No Impact. Under Alternative C, the existing HBFC campus would continue to operate under current conditions. The HBFC is currently connected to existing CVWD water and sewer infrastructure. CVWD is required to meet water quality requirements in the production and delivery of domestic water and sewage management, which also assures that RWQCB standards are met and groundwater is protected. No new impacts would occur.

b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

Alternative A (Less Intense)

Less that Significant. The same water demand factors used to analyze the proposed Project in Section 2.10.6 were used to analyze impacts associated with Alternative A. This alternative would generate a new water demand of 23.49 AFY, which is 4.36 AFY less than the proposed Project's total water demand.

Table 3.10-1
HBFC PDP Project Water Demands
Alternative A

Land Use	Unit		Factor		Gallons/ Day	Acre-feet/Year (AFY)
	Beds	SF	Quantity	Basis		
Residential/Treatment[1]	23		117.7	Gallons/bed/day	2,707.10	3.03
Admin/Office [2]		22,748	0.19	Gallons/SF/day	4,322.12	4.84
Landscaping	*Same as proposed Project*					15.62
					Total Water Demand	23.49

Source:
1. Residential demand based on the water demand factors for similar types of development in recent CVWD-approved WSAs PD 80 Project's Residential Water Demand Factor. Approved 11/25/2014.
2. Water Demand Factor for general office use (0.19 gallons per square foot per day) based on American Water Works Association Research Foundation (AWWARF), Commercial and Institutional End Uses of Water. 2000.

The proposed site is located within the CVWD service area, where urban water demands are estimated to grow from 114,600 AFY in 2020 to 194,300 AFY in 2040.[1] The net total water demand for Alternative A is expected to be 23.5 AFY. This represents approximately 0.02 percent of the total projected water supply of 114,600 AF for 2020, and would represent 0.01 percent of the total projected water supply of 194,300 AF for 2040. As identified for the proposed Project, CVWD has sufficient water supplies to meet the demands of this alternative for the next 20 years. This result is based on the volume of water available in the aquifer, CVWD's Colorado River contract supply, SWP Table A amounts, water rights, and water supply contracts, and CVWD's commitment to eliminate overdraft and reduce per capita water use in CVWD's service area.

[1] CVWD Urban Water Management Plan Final Report, July 1, 2016.

Future development under Alternative A will be subject to CVWD's water conservation measures to control water usage and runoff. Based on these findings, this alternative will not substantially deplete groundwater supplies or interfere with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level. Similar to the proposed Project, impacts would be less than significant.

Alternative B (More Intense)

Less that Significant. The same water demand factors used to analyze the proposed Project in Section 2.10.6 were used to analyze impacts associated with Alternative B. This alternative would generate a new water demand of 36.81 AFY, which is 8.96 AFY greater than the proposed Project's total water demand.

Table 3.10-2
HBFC PDP Project Water Demands
Alternative B

Land Use	Unit		Factor		Gallons/ Day	Acre-feet/Year (AFY)
	Beds	SF	Quantity	Basis		
Residential/Treatment[1]	124		117.7	Gallons/bed/day	14,594.80	16.35
Admin/Office [2]		22,748	0.19	Gallons/SF/day	4,322.12	4.84
Landscaping	*Same as proposed Project*					15.62
					Total Water Demand	36.81

Source:
1. Residential demand based on the water demand factors for similar types of development in recent CVWD-approved WSAs PD 80 Project's Residential Water Demand Factor. Approved 11/25/2014.
2. Water Demand Factor for general office use (0.19 gallons per square foot per day) based on American Water Works Association Research Foundation (AWWARF), Commercial and Institutional End Uses of Water. 2000.

The proposed site is located within the CVWD service area, where urban water demands are estimated to grow from 114,600 AFY in 2020 to 194,300 AFY in 2040.[2] The net total water demand for Alternative B is expected to be 37 AFY. This represents approximately 0.03 percent of the total projected water supply of 114,600 AF for 2020, and would represent 0.02 percent of the total projected water supply of 194,300 AF for 2040. As identified for the proposed Project, CVWD has sufficient water supplies to meet the demands of this alternative for the next 20 years. This result is based on the volume of water available in the aquifer, CVWD's Colorado River contract supply, SWP Table A amounts, water rights, and water supply contracts, and CVWD's commitment to eliminate overdraft and reduce per capita water use in CVWD's service area.

Future development under Alternative B will be subject to CVWD's water conservation measures to control water usage and runoff. Based on these findings, this alternative will not substantially deplete groundwater supplies or interfere with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level. Similar to the proposed Project, impacts would be less than significant.

Alternative C (No Project)

No Impact. Under Alternative C, the existing HBFC campus would continue to operate under current conditions and there will be no new water demands that could substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin. There will be no impact.

[2] CVWD Urban Water Management Plan Final Report, July 1, 2016.

c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

i) result in substantial erosion or siltation on- or off-site;

ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;

iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or

Alternative A (Less Intense)

Less than Significant Impact. There are currently two existing retention basins on-site that serve the needs of the current HBFC campus, one of which also serves as an irrigation pond and the second located in the parking area to the east. Similar to the proposed Project, Alternative A improvements would include the removal of four single-story residential buildings and replacement of these with two 2-story buildings. The proposed single-story day-treatment building will be located west of Vista Del Sol on a portion of the currently vacant east area of the campus site. As with the proposed Project site plan, two new retention basins would be constructed immediately south of the day-treatment building.

As demonstrated for the proposed Project, the two retention basins have been sized to store the 100-yr 24-hour design storm volume in accordance with City standards and regulations. Vegetation within and adjacent to the retention basins will serve as a measure of bio-remediation, and the depth of the soil column will ensure that neither surface not groundwater quality will be affected by the project's stormwater runoff. Alternative A will not substantially increase the rate of surface runoff, and proposed stormwater management facilities will preclude flooding either within the HBFC campus or off-site. Neither surface nor groundwater quality will be compromised.

With the provision of on-site stormwater retention and implementation of required BMPs (Section 2.10.7 Mitigation Measures HYD-1), no significant or substantially increased rate or amount of surface runoff will occur that would result in flooding or siltation on- or off-site. Impacts will be less than significant.

Alternative B (More Intense)

Less than Significant Impact. There are currently two existing retention basins on-site that serve the needs of the current HBFC campus, one of which also serves as an irrigation pond and the second located in the parking area to the east. Similar to the proposed Project and Alternative A, Alternative B improvements would include the removal of four single-story residential buildings and replacement of these with two 2-story buildings. The proposed single-story day-treatment building will be located west of Vista Del Sol on a portion of the currently vacant east area of the campus site. As with the proposed Project site plan, two new retention basins would be constructed immediately south of the day-treatment building and on either side of the proposed Vista Del Sol access drive.

As demonstrated for the proposed Project, the two retention basins have been sized to store the 100-yr 24-hour design storm volume in accordance with City standards and regulations. Vegetation within and adjacent to the retention basins will serve as a measure of bio-remediation, and the depth of the soil column will ensure that neither surface not groundwater quality will be affected by the project's stormwater runoff. Although Alternative B may result in a greater building footprint, it will not substantially increase the rate of surface runoff, and proposed stormwater management facilities will preclude flooding either within the HBFC campus or off-site. Neither surface nor groundwater quality will be compromised.

With the provision of on-site stormwater retention and implementation of required BMPs (Section 2.10.7 Mitigation Measures HYD-1), no significant or substantially increased rate or amount of surface runoff will occur that would result in flooding or siltation on- or off-site. Impacts will be less than significant.

Alternative C (No Project)

No Impact: Under Alternative C, the existing HBFC campus would continue to operate under current conditions and there will be no modifications to the site that would substantially increase the rate or amount of surface runoff that would result in flooding or siltation on- or off-site. There will be no impact.

iv) impede or redirect flood flows?

Alternative A (Less Intense)

Less than Significant Impact. Similar to the proposed Project, Alternative A is not expected to impede or redirect flood flows either generated on site or in the Project vicinity. A new block wall is proposed between the currently vacant six-acre portion of the campus and Vista Del Sol. Upstream tributary flows are from the northwest and have been cut off from the HBFC campus by the EMC campus and the Rancho Mirage Country Club development. North and east of the site, area-wide flows are northwest to southeast and are now limited to isolated, small drainages. Alternative A will not be required to accommodate, nor will they redirect, storm flows tributary to this site. On-site runoff will be retained on-site via two new retention basins. Therefore, impacts would be less than significant.

Alternative B (More Intense)

Less than Significant Impact. Similar to the proposed Project and Alternative A, Alternative B is not expected to impede or redirect flood flows either generated on-site or in the Project vicinity. Alternative B will not be required to accommodate, nor will it redirect, storm flows tributary to this site. On-site runoff will be retained on-site via two new retention basins. Therefore, impacts would be less than significant.

Alternative C (No Project)

No Impact: Under Alternative C, the existing HBFC campus would continue to operate under current conditions and there will be no new development that could potentially impede or redirect flood flows. The site's existing stormwater management systems would remain in place. There will be no impact.

d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

Alternative A (Less Intense)

Less than Significant Impact. The existing HBFC campus includes a shallow one-acre landscape/irrigation pond located in the southwest corner of the campus. Although there is a potential for this pond to generate waves in a strong seismic event, the extent of such sloshing is expected to be minimal due to the limited volume of water in the pond. Furthermore, there are no hazardous materials in proximity of the pond that could be affected by local pond inundation. With this exception, the site is not located in the vicinity of a large water body, including water storage tanks, debris basins or dams. No hazard from dam failure, tsunami, or seiche exists. The site is located within FEMA Flood Zone X, which is a non-special flood hazard zone with moderate- to low-risk of flooding. Impacts will be less than significant.

Alternative B (More Intense)

Less than Significant Impact. The existing HBFC campus includes a shallow one-acre landscape/irrigation pond located in the southwest corner of the campus. Although there is a potential for this pond to generate waves in a strong seismic event, the extent of such sloshing is expected to be minimal due to the limited volume of water in the pond. Furthermore, there are no hazardous materials in proximity of the pond that could be affected by local pond inundation. With this exception, the site is not located in the vicinity of a large water body, including water storage tanks, debris basins or dams. No hazard from dam failure, tsunami or seiche exists. The site is located within FEMA Flood Zone X, which is a non-special flood hazard zone with moderate- to low-risk of flooding. Impacts will be less than significant.

Alternative C (No Project)

Less than Significant Impact. The existing HBFC campus includes a shallow one-acre landscape/irrigation pond located in the southwest corner of the campus. Although there is a potential for this pond to generate waves in a strong seismic event, the extent of such sloshing is expected to be minimal due to the limited volume of water in the pond. Furthermore, there are no hazardous materials in proximity of the pond that could be affected by local pond inundation. With this exception, the site is not located in the vicinity of a large water body, including water storage tanks, debris basins or dams. No hazard from dam failure, tsunami or seiche exists. The site is located within FEMA Flood Zone X, which is a non-special flood hazard zone with moderate- to low-risk of flooding. Impacts will be less than significant.

e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Alternative A (Less Intense)

Less Than Significant. Similar to the proposed Project, Alternative A would been designed to include facilities that will safely capture and convey stormwater runoff to properly designed retention facilities, where bio-remediation and percolation will ensure that neither surface nor groundwater resources are adversely affected. As with the proposed Project, Alternative A would be designed in conformance with applicable water quality regulations of the City of Rancho Mirage and the Regional Water Quality Control Board. A WQMP would be prepared that further ensures that Alternative A will not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. Impacts would be less than significant.

Alternative B (More Intense)

Less Than Significant. Similar to the proposed Project, Alternative B would been designed to include facilities that will safely capture and convey stormwater runoff to properly designed retention facilities, where bio-remediation and percolation will ensure that neither surface nor groundwater resources are adversely affected. As with the proposed Project, Alternative B would be designed in conformance with applicable water quality regulations of the City of Rancho Mirage and the Regional Water Quality Control Board. A WQMP would be prepared that further ensures that Alternative B will not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. Impacts will be less than significant.

Alternative C (No Project)

No Impact. Under Alternative C, the existing HBFC campus would continue to operate under current conditions and there will be no new development that could potentially conflict or obstruct implementation of a water quality control plan or sustainable groundwater management plan. There will be no impact.

3.10.4 Mitigation Measures

Similar to the proposed Project, all build alternatives would be subject to Mitigation Measures HYD-1 and HYD-2, which ensure all projects conform to the NPDES Construction General Permit requirements and prepare a project-specific WQMP. No additional mitigation measures are required.

3.10.5 Environmental Superior Alternative

Overall, Alternative C would be the environmentally superior alternative because no new site modifications would occur that would increase the rate of run-off, impede flood flows, or increase water demands that could potentially affect groundwater supplies. However, of all the build alternatives, Alternative A would be considered environmentally superior because it would result in the lowest new water demand and smallest potential building footprints.

3.11 Land Use Planning

3.11.1 Introduction

The Hazelden Betty Ford Center campus opened in 1982 and has grown to a major health care facility. HBFC has heretofore been integrated into the campus of the Eisenhower Medical Center and has taken all access and utilities from within the EMC campus. Development within the HBFC campus is regulated by the EMC Specific Plan. This section evaluates the compatibility of and potential impacts from implementation of the two "build" alternatives, including Alternative A: Less Intense Alternative and Alternative B: More Intense Alternative, as well as Alternative C: No Project Alternative. Land use regulations that address land use planning in the study area are provided for evaluation of land use compatibility. Potential land use impacts resulting from alternatives' construction and operation are evaluated.

3.11.2 Existing Conditions

The City and the Coachella Valley are located in the central portion of Riverside County at the westernmost limits of the Sonoran Desert, also known as the Colorado Desert and formed by surrounding mountain range. The region is noted for prime agricultural lands in the eastern valley areas, and for resort residential and world-class tourist developments primarily in the western and central portions of the valley. The Project planning area evolved from vacant desert lands, through agriculture developed to resort, residential and commercial development.

The 26.22-acre Hazelden Betty Ford Center campus is located at the eastern end of the larger Eisenhower Medical Center campus, which extends from Vista Del Sol on the east to Bob Hope Drive on the west. The subject HBFC property is bounded by Vista Del Sol on the east, low density residential development to the south, and to the north by portions of the EMC campus and fairways and condominiums within the Rancho Mirage Country Club development beyond. The subject property is designated P/H (Hospital) on the City General Plan land use map and zoning map, and is also subject to the provisions of the Eisenhower Medical Center Specific Plan.

Today, all but approximately 6 acres of the HBFC campus has been developed. The remaining vacant lands are located along the west side of Vista Del Sol. Some of the vacant EMC lands, which are located to the north and total approximately 9.95 acres, are currently being used for construction staging in support of nearby on-campus EMC building expansions, while the easterly 8.50± acres of the EMC campus are vacant and undeveloped.

North and beyond the EMC campus is the golf course residential development of Rancho Mirage Country Club. South of the HBFC site are developed and partially developed residential lands, including the Wilshire Palms subdivision and a newly subdivided parcel comprised of four one-acre lots. East of the subject property are vacant five-acre parcels that are designated Residential Estate with maximum development densities of one dwelling unit per acre. To the southeast and on the east side of Vista Del Sol, lands have been subdivided, are within walled and gated areas, and are for sale. Farther east and along the west side of Vista Dunes Road additional one-acre lot development has occurred and these lands are approximately 85% built out.

3.11.3 Alternatives Impact Analysis

The development area for the proposed PDP Project remains the existing HBFC campus, including approximately 6 acres of associated vacant lands that extend east to Vista Del Sol. The two build alternatives analyzed below represent the same general type and location of development described in the proposed Project PDP but represent a less intense and a more intense development scenario, as described at the beginning of Section 3.

Would the Project:

a) Physically divide an established community?

Alternative A (Less Intense)

No Impact. The Less Intense Alternative A would be built on the same HBFC campus on contiguous land holdings that extend from Vista Del Sol on the east to the boundaries of the EMC campus to the west. The development and operation of residential communities and other residential development in the area will not be divided, segregated, or otherwise affected by the implementation of the Alternative A project. Compared to the proposed Project, less construction and a reduction in service and treatment facilities would result. However, as with the proposed Project, Alternative A will not divide an established neighborhood or community.

Alternative B (More Intense)

No Impact. The More Intense Alternative B would also be built on the same HBFC campus. The development and operation of residential communities and other residential development in the area will not be divided, segregated, or otherwise affected by the implementation of the Alternative B project. Compared to the proposed Project, more construction and an increase in services and treatment facilities would result. However, as with the proposed Project, Alternative B will not divide an established neighborhood or community.

Alternative C (No Project)

No Impact. The No Project Alternative would result in existing conditions being maintained the same HBFC campus on contiguous land holdings that extend from Vista Del Sol on the east to the boundaries of the EMC campus to the west. Alternative C would not divide an established neighborhood or community.

b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

Alternative A (Less Intense)

Less Than Significant with Mitigation. Like the Proposed Project, Alternative A is consistent with the *Hospital* land use designation assigned to the subject property in the Rancho Mirage General Plan Land Use Map, as well as applicable land use goals and policies of the General Plan Land Use Element and other elements that address land use and compatibility issues, including the Noise Element and Public Services and Facilities Element. It is also consistent with the Eisenhower Medical Center Specific Plan which serves as the zoning ordinance for the subject property. At buildout of Alternative A, square footage on the HBFC campus would total 150,667 square feet, which is less than the 213,018 square foot limit set forth by the EMC Specific Plan.

Like the proposed Project, Alternative A represents an expansion of capital improvements allowed under the City General Plan and the EMC Specific Plan. Compared to the proposed Project, Alternative A would result in a smaller-scale expansion, but the resulting project would continue to be functionally integrated with the EMC campus and other surrounding development and will facilitate the HBFC mission in meeting the social and psychological health needs of the community. It would continue to ensure privacy and safety for the surrounding residential neighborhood with comprehensive screening and buffering of the property from surrounding lands and will expand already efficiently located institutional services and facilities that can continue to serve the community.

Alternative A allows the expansion of a low-impact land use that has, to date, generated no significant adverse impacts on surrounding lands or land uses. The levels of service provided by local providers and infrastructure, including the proposed infrastructure improvements, will assure that adequate levels of service are maintained and remain compatible with existing and planned land uses in the vicinity. Also see Sections 2.15: Public Services, 2.16: Transportation and Traffic, and 2.17: Utilities and Service Systems.

Lands to the north, south, and east of the subject property are developed as or planned for low density residential uses, which are noise sensitive. The adjoining Barbara Sinatra Children's Center and other offices and facilities on the EMC campus may also be viewed as sensitive noise receptors. While Project demolition and construction may have a limited, short-term impact on neighborhood noise levels, the post-construction noise environment will not change significantly from the current conditions. Also see Section 2.13: Noise of this EIR.

Alternative A would also help the City to meet its goals of ensuring the availability of high-quality healthcare facilities and services that promote the health and well-being of the community's residents. Substance abuse and other addiction behaviors have become a national health crisis, and the proposed HBFC capital expansion serves to directly address this need. It also allows the HBFC to adapt to the changing demographics of the community and region, and its changing mental and emotional health needs.

In summary, Alternative A will not conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Rather, it will result in the updating and modest expansion of existing healthcare facilities, the need for and changing nature of which have been growing over the past decades. Impacts would be less than significant.

Like the proposed Project, impacts of Alternative A would be less than significant. Nonetheless, the same Mitigation Measure LU-1 (Construction Staging) recommended for the proposed Project in Section 2.11.7 is recommended for Alternative A.

Alternative B (More Intense)

Less Than Significant with Mitigation. Like the Proposed Project, Alternative B is consistent with the *Hospital* land use designation assigned to the subject property in the Rancho Mirage General Plan Land Use Map, as well as applicable land use goals and policies of the General Plan Land Use Element and other elements that address land use and compatibility issues, including the Noise Element and Public Services and Facilities Element. It is also consistent with the Eisenhower Medical Center Specific Plan which serves as the zoning ordinance for the subject property. At buildout of Alternative B, square footage on the HBFC campus would total 209,428 square feet, which is less than the 213,018 square foot limit set forth by the EMC Specific Plan.

Like the proposed Project, Alternative B represents an expansion of capital improvements allowed under the City General Plan and the EMC Specific Plan. Compared to the proposed Project, Alternative B would result in a larger-scale expansion, but the resulting project would continue to be functionally integrated with the EMC campus and other surrounding development and will facilitate the HBFC mission in meeting the social and psychological health needs of the community. It would continue to ensure privacy and safety for the surrounding residential neighborhood with comprehensive screening and buffering of the property from surrounding lands and will expand already efficiently located institutional services and facilities that can continue to serve the community.

Alternative B allows the expansion of a low-impact land use that has, to date, generated no significant adverse impacts on surrounding lands or land uses. The levels of service provided by local providers and infrastructure, including the proposed infrastructure improvements, will assure that adequate levels of service are maintained and remain compatible with existing and planned land uses in the vicinity. Also see Sections 2.15: Public Services, 2.16: Transportation and Traffic, and 2.17: Utilities and Service Systems.

Lands to the north, south, and east of the subject property are developed as or planned for low density residential uses, which are noise sensitive. The adjoining Barbara Sinatra Children's Center and other offices and facilities on the EMC campus may also be viewed as sensitive noise receptors. While Project demolition and construction may have a limited, short-term impact on neighborhood noise levels, the post-construction noise environment will not change significantly from the current conditions. Also see Section 2.13: Noise of this EIR.

Alternative B would also help the City to meet its goals of ensuring the availability of high quality healthcare facilities and services that promote the health and well-being of the community's residents. Substance abuse and other addiction behaviors have become a national health crisis, and the proposed HBFC capital expansion serves to directly address this need. It also allows the HBFC to adapt to the changing demographics of the community and region, and its changing mental and emotional health needs.

In summary, Alternative B will not conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Rather, it will result in the updating and modest expansion of existing healthcare facilities, the need for and changing nature of which have been growing over the past decades. Impacts would be less than significant.

Like the proposed Project, impacts of Alternative B would be less than significant. Nonetheless, the same Mitigation Measure LU-1 (Construction Staging) recommended for the proposed Project in Section 2.11.7 is recommended for Alternative B.

Alternative C (No Project)

Less Than Significant Impact. Alternative C represents the continuation of existing conditions at the HBFC campus. No buildings would be demolished, no new buildings would be built, no access or infrastructure improvements would occur, and no services would be expanded.

Existing land uses are consistent with the *Hospital* land use designation assigned to the subject property in the General Plan Land Use Map. The existing facility is also consistent with the Eisenhower Medical Center Specific Plan which serves as the zoning ordinance for the subject property. The existing 137,200 square foot facility is less than the 213,018 square foot limit set forth by the EMC Specific Plan.

Alternative C does not overtly conflict with General Plan Land Use Element policies or other policies addressing land use compatibility. Existing institutional uses are currently efficiently located to serve the community, compatible with surrounding land uses, and adequately buffered from adjacent properties. However, Alternative C does not maximize the growth opportunities provided in Policy 8.1 of the General Plan Public Services and Facilities Element, which encourages the City to coordinate with all medical service providers to assure adequate health care facilities and services to meet the needs of City residents, or Policy 8.2 which encourages the development of medical and health care facilities that address changing demographics and the City's desire to expand the economic base of the community. In maintaining the status quo, Alternative C does not allow HBFC to expand or modernize onsite facilities, improve access to the HBFC campus, or expand the economic base of the community through new jobs and enhanced healthcare services. Impacts would be less than significant, but the benefits of expansion proposed by the Project, Alternative A, and Alternative B would not be realized.

3.11.4 Mitigation Measures

Mitigation Measure LU-1, as described in Section 2.11.7 for the proposed Project, is recommended for Alternative A and Alternative B. No mitigation measures are required for Alternative C.

3.11.5 Environmental Superior Alternative

None of the Project alternatives would physically divide an established community or cause a significant environmental impact due to a conflict with a land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. However, the proposed Project, Alternative A, and Alternative B are superior to Alternative C because they allow HBFC to expand the community's healthcare services and facilities, consistent with General Plan policies.

Of the three "build" alternatives, Alternative A would be the environmentally superior alternative because it would result in the least square footage and lowest level of human activity that could generate potential noise, traffic, and/or other land use compatibility issues.

3.12 Mineral and Energy Resources

3.12.1 Introduction

This section describes existing mineral and energy resources in the Project area, with an emphasis on electricity and natural gas use and infrastructure and fuel use. It also evaluates potential impacts on mineral and energy resources that could occur as a result of implementing the Project alternatives and analyzes the level of impact these alternatives would have on those resources.

3.12.2 Existing Conditions

Lands within the HBFC Project planning area are classified as MRZ-1,[1] indicating that little likelihood exists for the presence of significant mineral resources. In addition, the Project site is partially developed and is surrounded by existing urban development, making it unsuitable for mineral extraction operations.

Currently, the electricity and natural gas demands of the Betty Ford Center are adequately serviced by SCE and SoCalGas. Given that all Project alternatives would be located on the same site as the proposed Project, the regulatory framework, environmental setting, and existing condition analysis provided in Section 2.12 also applies to all alternatives analyzed below.

3.12.3 Alternatives Impact Analysis

Mineral Resources

Would the Project:

a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

Alternative A (Less Intense)

Less Than Significant Impact. Alternative A would result in construction of new buildings and paved surfaces, including sidewalks, which will increase the demand for aggregate resources. However, compared to the proposed Project, Alternative A would result in 19,457 fewer square feet of building space and no new access driveway and, therefore, its demand for construction materials would be less than that of the Project. Some of these resources could be derived from the regional Coachella Valley market, which are a valuable regional commodity. However, demand of Alternative A would not be considered significant when compared to available regional resources. As described in Section 2.12.5, PCC-grade aggregate reserves in the Palm Springs Production-Consumption Region are projected to be enough to meet future demand in the region through the year 2038. Some aggregate resources used in Project construction may be acquired from recycled aggregate or regions outside the Coachella Valley, thereby reducing the consumption of local supplies. Therefore, the potential loss of availability of these local resources resulting from Alternative A would be less than significant.

[1] Update of Mineral Land Classification Map for Portland Cement Concrete-Grade Aggregate in the Palm Springs Production-Consumption (P-C) Region, Riverside County, California, Special Report 198 – Plate 1, California Department of Conservation, 2007.

Alternative B (More Intense)

Less Than Significant Impact. Alternative B would result in construction of new buildings and paved surfaces, including a new access driveway and sidewalks, which will increase the demand for aggregate resources. Alternative B would result in 39,304 more square feet of building space than the proposed Project and, therefore, its demand for construction materials would be greater than that of the Project. However, demand of Alternative B would not be considered significant when compared to available regional resources. As described in Section 2.12.5, PCC-grade aggregate reserves in the Palm Springs Production-Consumption Region are projected to be enough to meet future demand in the region through the year 2038. Some aggregate resources used in Project construction may be acquired from recycled aggregate or regions outside the Coachella Valley, thereby reducing the consumption of local supplies. Therefore, the potential loss of availability of these local resources resulting from Alternative B would be less than significant.

Alternative C (No Project)

No Impact. Alternative C will result in the continuation of existing conditions. No new buildings or paved surfaces would be built. There will be no new adverse effect on mineral resources in the region. No impact would occur.

b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

Alternative A (Less Intense)

No Impact. Alternative A would disturb the same site as the proposed Project. The subject property is located within MRZ-1. MRZ-1 is a Mineral Resource Zone where geological information indicates that little likelihood exists for the presence of significant mineral resources. Moreover, the subject property is partially developed and is surrounded by existing urban development, making it unsuitable for mineral extraction operations. Alternative A would result in no impact to a mineral resource recovery site.

Alternative B (More Intense)

No Impact. Alternative B would disturb the same site as the proposed Project. As discussed above, the subject property is located within MRZ-1, where little likelihood exists for the presence of significant mineral resources. Moreover, the property is partially developed and surrounded by existing urban development, and thus unsuitable for mineral extraction operations. Alternative B would result in no impact to a mineral resource recovery site.

Alternative C (No Project)

No Impact. Alternative C will result in the continuation of existing conditions. There will be no new adverse effect on a locally important mineral resource recovery site. No impact would occur.

Energy

Would the Project:

a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Alternative A (Less Intense)

Alternative A would disturb the same site as the proposed Project, but result in 33 fewer new beds and 19,457 fewer square feet of new building area. As discussed in Section 2.12.6, equipment fuels such as diesel and petroleum, rather than electricity or natural gas, will be the primary energy sources used during construction. Compared to the proposed Project, Alternative A will generate fewer VMTs during construction due to fewer trips required for construction of "smaller" buildings and no new driveway. Because it is assumed that most construction workers will live locally, it is reasonable to assume that these VMTs have already been accounted for in the community-wide VMT assumptions for worker commutes, insofar as these workers currently commute to other job sites, and do not constitute a new source of VMTs. Overall, petroleum and diesel use during construction would be temporary and minimal and would not be wasteful or inefficient. Construction-related transportation energy impacts would be less than significant, and although less than significant impacts are also anticipated for the proposed Project, impacts associated with construction of Alternative A would be less than the proposed Project.

According to the CalEEMod outputs, the operation of Alternative A would consume an estimated 208,642 kWh electricity per year for various purposes, such as ventilating/air conditioning (HVAC), refrigeration, lighting, electronics, office and medical equipment, and commercial machinery (including kitchen and laundry appliances) (Table 3.12-1 **Net Energy Consumption Estimates for the proposed Project and Project Alternatives**).[2] Alternative A's electricity demand would represent less than 0.1 percent increase in annual City-wide kWh usage. Under Alternative A, electricity consumption would be approximately 60 percent less than for the proposed Project.

Operation of Alternative A would consume natural gas for heating, cooking, and powering equipment, such as furnaces. Current annual natural gas consumption at the Betty Ford Center is approximately 70,968 therms.[3] At buildout, Alternative A would consume 6,966 therms per year of natural gas (Table 3.12-1 **Net Energy Consumption Estimates for the proposed Project and Project Alternatives**), which is less than 0.1 percent increase in annual City-wide usage. Under Alternative A, natural gas consumption would be approximately 59 percent less than the proposed Project.

Alternative A would comply with the current California Building Code and Energy Code standards to ensure efficient consumption of electricity and natural gas. Under Alternative A, the proposed buildings will be designed ready for the installation of solar panels, which could further offset electricity demand in the future. Alternative A will not result in wasteful, inefficient, or unnecessary consumption of electrical energy and natural gas resources during operation and, therefore, impacts would be less than significant, and less than those associated with the proposed Project.

During operation, Alternative A would result in 657,199 vehicle miles traveled (VMTs) to and from the subject property[4], resulting in the consumption of petroleum-based fuels related to vehicular travel. Employees and visitors will include a mix of local residents and out-of-town visitors. It should be noted that VMTs are regional in nature, and that not all Alternative A VMTs will occur solely within the City's boundaries. The EPA and CARB set forth up-to-date vehicle fuel efficiency standards to reduce vehicle emissions. Increased fuel efficiency means less fuel energy consumed per mile traveled. Although Alternative A will increase VMTs compared to existing conditions, it will not interfere with increased fuel efficiency standards and will not result in wasteful, inefficient, or unnecessary consumption of transportation energy resources during operation. Impacts would be less than significant.

2 CalEEMod outputs for Alternative A (see Appendix B).
3 SoCalGas natural gas statements for the Betty Ford Center, December 2018 through January 2020.
4 CalEEMod outputs and Project-specific data (see Appendix B).

Alternative B (More Intense)

Alternative B would disturb the same site as the proposed Project, but result in 39,304 more square feet of new building area and 52 more new beds than the Project. As discussed in Section 2.12.6, equipment fuels such as diesel and petroleum, rather than electricity or natural gas, will be the primary energy sources used during construction. Compared to the proposed Project, Alternative B will generate more VMTs during construction due to more trips required for construction of "larger" buildings and a new access driveway. As discussed in Section 2.12.6 and above, petroleum and diesel use during construction would be temporary and minimal and would not be wasteful or inefficient. Construction-related transportation energy impacts would be less than significant, and although less than significant impacts are also anticipated for the proposed Project, impacts associated with construction of Alternative B would be greater than the proposed Project.

According to the CalEEMod outputs, the operation of Alternative B would consume an estimated 1,178,542 kWh of electricity per year for various purposes, such as ventilating/air conditioning (HVAC), refrigeration, lighting, electronics, office and medical equipment, and commercial machinery (including kitchen and laundry appliances) (Table 3.12-1 **Net Energy Consumption Estimates for the proposed Project and Project Alternatives**).[5] Alternative B's electricity demand would represent less than 0.6 percent increase in annual City-wide kWh usage. Under Alternative B, the additional electricity consumption would be approximately 2.26 times of that under the proposed Project.

Operation of Alternative B would consume natural gas for heating, cooking, and powering equipment, such as furnaces. Current annual natural gas consumption at the Betty Ford Center is approximately 70,968 therms.[6] At buildout, Alternative B would consume an additional 37,361 therms per year of natural gas (Table 3.12-1 **Net Energy Consumption Estimates for the proposed Project and Project Alternatives**), which is less than 0.4 percent increase in annual City-wide usage. Under Alternative B, the additional natural gas consumption would be approximately 2.19 times of that under the proposed Project.

Alternative B would comply with the current California Building Code and Energy Code standards to ensure efficient consumption of electricity and natural gas. Under Alternative B, the proposed buildings will be designed ready for the installation of solar panels, which could further offset electricity demand in the future. Alternative B will not result in wasteful, inefficient, or unnecessary consumption of electrical energy and natural gas resources during operation and, therefore, impacts would be less than significant, though more significant than those associated with the proposed Project.

During operation, Alternative B would result in an additional 3,095,804 vehicle miles traveled to and from the subject property[7], resulting in the consumption of petroleum-based fuels related to vehicular travel. Employees and visitors will include a mix of local residents and out-of-town visitors. It should be noted that VMTs are regional in nature, and that not all Alternative B VMTs will occur solely within the City's boundaries. The EPA and CARB set forth up-to-date vehicle fuel efficiency standards to reduce vehicle emissions. Increased fuel efficiency means less fuel energy consumed per mile traveled. Although Alternative B will increase VMTs compared to existing conditions, it will not interfere with increased fuel efficiency standards and will not result in wasteful, inefficient, or unnecessary consumption of transportation energy resources during operation. Impacts would be less than significant.

Alternative C (No Project)

5 CalEEMod outputs for Alternative B.
6 SoCalGas natural gas statements for the Betty Ford Center, December 2018 through January 2020.
7 CalEEMod outputs and Project-specific data (see Appendix B).

Less Than Significant. Alternative C will result in the continuation of existing conditions. No construction will occur, and no construction-related consumption of energy resources will occur. Operational energy demand will continue at the current rate, which would be higher on a per-bed basis and less efficient than the three "build" alternatives because the new buildings would be built to current energy-efficient standards in contrast to existing buildings built in the 1980s. No change in VMTs to and from the Betty Ford Center is expected. Overall impact due to wasteful, inefficient, or unnecessary consumption of energy resources during operation would be less than significant.

Table 3.12-1
Net Energy Consumption Estimates for the proposed Project and Project Alternatives

	Proposed Project	Alternative A	Alternative B
Electricity (kWh per year)	521,146	208,642	1,178,542
Natural Gas (therms per year)	17,030	6,966	37,361
Vehicle-miles traveled (VMT per year)	1,453,970	657,199	3,095,804

Source: CalEEMod Modelling for the proposed Project and Project alternatives, February 2019 (see Appendix B).

b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Alternative A (Less Intense)

No Impact. Alternative A would comply with all applicable regulations on renewable energy and energy efficiency in its design, construction, and operation. It would follow the 2019 California Green Building Code and 2019 Energy Code to ensure the most efficient construction/building technologies are used to benefit overall building operations in the long term. The proposed buildings under Alternative A are designed to be solar-ready to accommodate installation of solar panels in the future. Adherence to the applicable state standards enforced by the City will ensure the Alternative is consistent with current energy standards and conservation goals. Alternative A will not interfere with any state or local plan that promotes renewable energy or energy efficiency; therefore, no impact would occur.

Alternative B (More Intense)

No Impact. As with Alternative A and the proposed Project, Alternative B would comply with all applicable regulations on renewable energy and energy efficiency in its design, construction, and operation. It would follow the 2019 California Green Building Code and 2019 Energy Code to ensure the most efficient construction/building technologies are used to benefit overall building operations in the long term. The proposed buildings under Alternative B are designed to be solar-ready to accommodate installation of solar panels in the future. Adherence to the applicable state standards enforced by the City will ensure the Alternative is consistent with current energy standards and conservation goals. Alternative B will not interfere with any state or local plan that promotes renewable energy or energy efficiency; therefore, no impact would occur.

Alternative C (No Project)

No Impact. Alternative C will result in the continuation of existing conditions. There will be no impact related to compliance with a state or local plan for renewable energy or energy efficiency in the short term. However, as the state and local agencies adopt more stringent standards and plans to promote energy efficiency, the existing campus may need to undergo energy upgrades which can be more costly in the long term than replacing with new buildings that meet the current energy standards.

3.12.4 Mitigation Measures

No mitigation measures would be required for all three Alternatives as there would be no or less than significant impacts on mineral and energy resources.

3.12.5 Environmental Superior Alternative

With regard to potential impacts on mineral and energy resources, Alternative C (No Project) is superior to the three "build" alternatives because it would not result in consumption of mineral or energy resources for construction, nor any increase in overall operational energy consumption. Among the three "build" alternatives, Alternative A would be the environmentally superior alternative because it would result in the least overall additional energy consumption and the least demand for mineral resources, such as aggregate.

3.13 Noise

3.13.1 Introduction

This section describes the existing noise environment in the Project area and analyzes the potential noise impacts associated with the Project alternatives. It is based on a wide range of information, including the Project-specific Noise Impact Analysis prepared by Urban Crossroads[1] in February 2020 (see Appendix G).

3.13.2 Existing Conditions

The Rancho Mirage noise environment is typical of a resort residential community. Primary noise sources include vehicle traffic on area roadways, commercial operations (such as loading, unloading, and materials transfers), operation of mechanical equipment, outdoor concerts and sporting events and, in some areas, occasional aircraft flyovers and passing trains.

The noise environment in the Project vicinity is generally quiet. Noise sources include vehicles accessing the site, delivery and loading operations, parking lot activity, occasional helicopter operations on the EMC campus, and mechanical equipment. Sensitive receptors in the Project area include multi-family dwelling units, the EMC hospital and medical offices, and currently vacant land designated for future residential development.

See Section 2.13 for a detailed discussion of existing noise conditions.

3.13.3 Alternatives Impact Analysis

Would the Project result in:

a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Alternative A (Less Intense)

Less Than Significant Impact.

Potential Construction Noise Impacts
Alternative A would generate noise during demolition, site preparation, grading, building construction, paving, and the application of architectural coatings. Noise sources would include trucks and heavy machinery, power tools, concrete mixers, portable generators, and related equipment. The highest noise impacts would occur when construction activities occur at the closest point from the edge of the construction activity areas to the nearest sensitive receiver locations.

As described in Section 2.13.6(a), for the proposed Project, unmitigated construction noise levels at sensitive receiver locations R1 through R5 would not exceed noise level thresholds, and impacts would be less than significant. Alternative A construction noise levels would be comparable to, but less than, those of the Project because Alternative A proposes the same demolition and construction activities as the proposed Project (at the same distance from sensitive receivers), but smaller buildings (fewer square feet) and no new access driveway or

[1] "Hazelden Betty Ford Center Noise Impact Analysis City of Rancho Mirage", prepared by Urban Crossroads, Inc., February 9, 2020.

improvements to Vista Del Sol. The unmitigated construction noise impacts of Alternative A would not exceed acceptable noise level thresholds and less than significant. It should be noted that construction noise is exempt from noise limits if activities occur between 7:00 a.m. and 7:00 p.m. on weekdays.

Potential Operational Noise Impacts
Alternative A operational noise would be generated by stationary sources, such as air conditioning units, parking lot activity (cars pulling in and out, people talking), and outdoor courtyard activity. As explained in Section 2.13.6(a), operational noise impacts of the proposed Project at sensitive receptor locations R1 through R5 would not exceed the City's exterior noise level thresholds. Alternative A would result in the same land uses, site conditions, building types, and distance between stationary noise sources and sensitive receivers as the proposed Project, but its buildings would be smaller and would accommodate fewer patients and employees. Therefore, noise from stationary noise sources would be expected to be comparable to, but less than, that of the proposed Project. Operational noise levels would not exceed the City's exterior noise level thresholds at sensitive receivers. Impacts would be less than significant.

Potential Traffic Noise Impacts
Alternative A would generate an estimated 270 new vehicle trips[2] that would increase traffic noise onsite and on area roadways. As explained in Section 2.13.6(a), the proposed Project would generate 562 new vehicle trips, but noise associated with increased vehicle trips would not exceed significance criteria. Given that Alternative A would generate 52% fewer trips than the proposed Project, Alternative A's traffic noise intensities would not be expected to exceed significance criteria. All new vehicle trips and noise increases would occur on Betty Ford Way and other existing onsite roadways and connecting arterials. Vehicle noise increases would not directly impact Vista Del Sol because Alternative A does not propose a new access driveway between the HBFC campus and Vista Del Sol. Impacts would be less than significant.

Comparison with Proposed Project
Similar to the proposed Project, Alternative A would result in less than significant impacts.

Alternative B (More Intense)

Less Than Significant Impact.

Potential Construction Noise Impacts
Alternative B would generate noise during demolition, site preparation, grading, building construction, paving, and the application of architectural coatings. Noise sources would include trucks and heavy machinery, power tools, concrete mixers, portable generators, and related equipment. The highest noise impacts would occur when construction activities occur at the closest point from the edge of the construction activity areas to the nearest sensitive receiver locations.

As described in Section 2.13.6(a), for the proposed Project, unmitigated construction noise levels at sensitive receiver locations R1 through R5 would not exceed noise level thresholds, and impacts would be less than significant. Alternative B construction noise levels would be comparable to those of the Project because it would result in the same demolition activities, construction methods, site conditions, roadway improvements, and distance to sensitive receivers as the Project. However, Alternative B would result in the construction of ±39,304 more square feet than the Project, and the duration of construction and associated noise impacts could be longer. Nonetheless, the unmitigated construction noise impacts of Alternative B are expected to remain below noise level thresholds and less than significant. It should be noted that construction noise is exempt from noise limits if activities occur between 7:00 a.m. and 7:00 p.m. on weekdays.

[2] Project (Less Intense) Trip Generation Summary, Urban Crossroads, February 9, 2020 (see Appendix H).

Potential Operational Noise Impacts
Alternative B operational noise would be generated by stationary sources, such as air conditioning units, parking lot activity, and outdoor courtyard activity. As explained in Section 2.13.6(a), operational noise impacts of the proposed Project at sensitive receptor locations R1 through R5 would not exceed the City's exterior noise level thresholds. Compared to the proposed Project, Alternative B would be larger (±39,304 more square feet) and would accommodate 68 more patients and 25 more employees. As such, it could be expected to have additional mechanical equipment and outdoor activity, and increased operational noise levels. However, the land uses, site conditions, building types, and distance between stationary noise sources and sensitive receivers would be the same as the proposed Project. Operational noise levels would not be expected to exceed the City's exterior noise thresholds at sensitive receivers. Impacts would be less than significant.

Potential Traffic Noise Impacts
Alternative B would generate an estimated 1,164 new vehicle trips[3] that would increase traffic noise onsite and on area roadways. As explained in Section 2.13.6(a), the proposed Project would generate 562 new vehicle trips, but traffic noise dBA CNEL increases would be minimal (0.0 to 1.6 dBA CNEL greater than existing conditions) and well below the significance criteria shown in Table 2.13-11. Alternative B would generate 107% more vehicle trips than the proposed Project. Assuming Alternative B's traffic noise increases were roughly double those of the proposed Project, they would still be well below significance thresholds. Like the proposed Project, Alternative B's traffic noise increases would occur on internal driveways and connecting arterials, as well as Vista Del Sol because the new driveway access would provide HBFC traffic with direct access to Vista Del Sol. Impacts would be below threshold criteria and less than significant.

Alternative C (No Project)

No Impact. Alternative C would result in the continuation of existing conditions. No new temporary or permanent increases in ambient noise levels in the Project vicinity would occur.

b) Generation of excessive groundborne vibration or groundborne noise levels?

Alternative A (Less Intense)

Less Than Significant Impact. Alternative A would result in demolition and construction that would generate short-term, intermittent, and localized groundborne vibration from the operation of trucks and heavy construction equipment. As analyzed in Section 2.13.6(b), Noise, construction vibration levels of the proposed Project at nearby sensitive receiver locations R1 through R5 would be less than the 80 VbB residential thresholds identified by the Federal Transit Administration (FTA), and impacts of the Project would be less than significant. Alternative A would result in demolition of the same buildings as the proposed Project. However, Alternative A would result in the construction of smaller buildings (less square footage) than the proposed Project and would not involve the construction of a new access driveway or improvements to Vista Del Sol; therefore, its groundborne vibration and noise levels would be less than the proposed Project. Construction vibration levels of Alternative A would be less than significant. Impacts would be temporary and would end upon completion of the construction phase.

No groundborne vibration or noise is anticipated during long-term operation of Alternative A.

Both Alternative A and the proposed Project would result in less than significant impacts.

[3] Project (More Intense) Trip Generation Summary, Urban Crossroads, February 9, 2020 (see Appendix H).

Alternative B (More Intense)

Less Than Significant Impact. Alternative B would result in demolition and construction that would generate short-term, intermittent, and localized groundborne vibration from the operation of trucks and heavy construction equipment. Alternative B would result in demolition of the same buildings as the proposed Project, and construction of the same new access driveway and Vista Del Sol improvements as the proposed Project. Alternative B proposes larger new buildings (more square footage) than the proposed Project and, therefore, its construction phase and generation of groundborne vibration and noise could be somewhat longer in duration than the proposed Project. However, site conditions, construction methods, and distance between the subject property and sensitive receivers would be the same for Alternative B and the proposed Project; therefore, vibration levels at sensitive receiver locations R1 through R5 would be comparable and less than FTA thresholds. Impacts would be temporary and would end upon completion of the construction phase. Impacts would be less than significant.

No groundborne vibration or noise is anticipated during long-term operation of Alternative B.

Both Alternative B and the proposed Project would result in less than significant impacts.

Alternative C (No Project)

No Impact. Alternative C would not generate excessive groundborne vibrations or noise levels. No demolition or new construction would occur, and no heavy equipment or vehicles capable of generating groundborne vibrations or noise would be onsite. Vibration and noise levels would remain unchanged from current conditions. No impact would occur.

c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

Alternative A (Less Intense)

Less Than Significant Impact. Alternative A and the proposed Project would occur on the same site, which is not within the vicinity of a public airstrip or within two miles of a public airport or public use airport. It is not contained within an airport land use plan. The Palm Springs International Airport is approximately 7 miles northwest of the subject site, and the Bermuda Dunes Airport is approximately 7 miles to the east. No airport-related noise impacts would occur.

The EMC helipad is ±1,000 feet northwest of the nearest existing and future buildings on the subject property. As explained in Section 2.13.5, Noise, existing buildings on the site are currently impacted by helipad operations, which are intermittent and of short duration. Noise levels vary depending on helicopter type, flight path, and altitude, as well as atmospheric conditions.

Alternative A would have no impact on helicopter operations, and helicopter noise would continue to be produced during take-offs, flyovers, and approaches. The distance between new HBFC buildings and the helipad would remain generally unchanged from current conditions. New buildings would be built to current building codes, which would result in improved noise insulation compared to existing buildings constructed in the early 1980s, thereby reducing interior noise impacts.

Potential helicopter noise impacts would not expose people residing or working in the area to excessive noise levels. As noted in Section 2.13.5, sound emitted for the purpose of altering persons to an emergency and the general emission of sound during performance of emergency work is exempt from the noise standards of the City Noise Ordinance. Impacts would be less than significant.

Alternative A and the proposed Project would result in the same level of impact.

Alternative B (More Intense)

Less Than Significant Impact. Alternative B and the proposed Project would occur on the same site. As explained in Section 2.13.6 and above, the site is not within the vicinity of a public airstrip or within two miles of a public airport or public use airport, and it is not contained within an airport land use plan. No airport-related noise impacts would occur.

The EMC helipad is ±1,000 feet northwest of the nearest existing and future buildings on the subject property. Existing buildings on the site are currently impacted by helipad operations, which are intermittent and of short duration. Noise levels vary depending on helicopter type, flight path, and altitude, as well as atmospheric conditions.

Alternative B would have no impact on helicopter operations, and helicopter noise would continue to be produced during take-offs, flyovers, and approaches. The distance between new HBFC buildings and the helipad would remain generally unchanged from current conditions. New buildings would be built to current building codes, which would result in improved noise insulation compared to existing buildings constructed in the early 1980s, thereby reducing interior noise impacts.

Potential helicopter noise impacts would not expose people residing or working in the area to excessive noise levels. As noted in Section 2.13.5 (Noise) and above, sound emitted for the purpose of altering persons to an emergency and the general emission of sound during performance of emergency work is exempt from the noise standards of the City Noise Ordinance. Impacts would be less than significant.

Alternative B and the proposed Project would result in the same level of impact.

Alternative C (No Project)

No Impact. The site is not within the vicinity of a private airstrip or within two miles of a public airport or public use airport, and is not contained within an airport land use plan. No airport-related noise impacts would occur.

Existing buildings on the subject property are currently exposed to helicopter noise from the EMC helipad ±1,000 feet northwest of the subject property. Alternative C would have no impact on helicopter operations, and helicopter noise would continue to be produced during take-offs, flyovers, and landings. Interior noise levels at HBFC buildings would remain unchanged from current conditions and would not benefit from improved noise insulation that would be provided by new buildings proposed by the Project, Alternative A, or Alternative B. No impact would occur.

3.13.4 Mitigation Measures

For all alternatives, there will be no or less than significant impacts. No mitigation measures are required.

3.13.5 Environmental Superior Alternative

With regard to potential noise impacts, Alternative C (No Project) is superior to the three “build” alternatives. It represents a continuation of existing conditions. No demolition, construction, or additional traffic noise would occur, and no new noise sources or increased noise levels would be generated. However, interior noise levels at HBFC buildings would not benefit from improved noise insulation provided by new buildings under the other alternatives.

Of the three "build" alternatives, Alternative A (Less Intense) would be superior because it would result in the least amount of new building construction, fewer road improvements, the fewest new vehicle trips on area roadways, and the fewest new employees and patients onsite, thereby reducing the construction duration and exposing the fewest patients and employees to potentially significant noise impacts.

3.14 Population, Housing and Socio-Economic Resources

3.14.1 Introduction

This section analyzes the potential population, housing, socio-economic, and environmental justice impacts associated with the Project alternatives.

3.14.2 Existing Conditions

Project Area

The Rancho Mirage population was 18,489 in 2019[1], and it is expected to reach 25,000 by 2040.[2] The local housing market includes a mix of single- and multi-family dwelling units and mobile homes. There are 14,596 dwelling units in the City, the majority (54.4%) of which is single-family detached units.[3] The average household size is 2.06 persons per household, and the relatively high vacancy rate (38.7%) is an indicator of the City's strong second home and vacation rental market.

The majority (27.1%) of the City's civilian labor force is employed in "educational services, health care, and social assistance," followed by the "finance, insurance, real estate, and leasing" sector which employs 14.9% of the labor force.[4] The City's 2018 annual average unemployment rate was 3.5%,[5] and the median household income is $64,754.[6]

There are no disadvantaged communities, as designated by CalEPA and the Office of Environmental Health, in Rancho Mirage or surrounding jurisdictions. The nearest is 9+ miles to the east.

Subject Property

The HBFC is a temporary treatment facility with 5 residential buildings totaling ±66,394 square feet of residential treatment space and 100 beds. It can house a maximum of 100 patients on a short-term basis (generally maximum of 30 days). No permanent housing or population is located onsite. HBFC currently employs 211 people.

The nearest dwelling units to the subject property include: 1) duplex units at the Wilshire Palms neighborhood to the south, 2) single-family units on Carrera Place to the southeast, and 3) and single- and multi-family units at the Rancho Mirage Country Club north of MacMillan Way/Emergency Room Access Road.

There are no disadvantaged communities located on the Project site or its vicinity.

1 Report E-5: City/County Population and Housing Estimates, January 1, 2019, California Department of Finance.
2 Southern California Association of Governments 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy, Environmental Justice Appendix, adopted April 2016.
3 Ibid.
4 2013-2017 American Community Survey 5-Year Estimates.
5 "Monthly Labor Force Data for Cities and Census Designated Places (CDP), Annual Average 2018-Revised, Data Not Seasonally Adjusted," California Employment Development Department.
6 2013-2017 American Community Survey 5-Year Estimates.

3.14.3 Alternatives Impact Analysis

Would the Project:

a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

Alternative A (Less Intense)

Less Than Significant Impact. As shown in Table 3.14-1, compared to existing conditions, Alternative A would remove 80 beds (due to demolition) and add 103 new beds (due to new construction), thereby resulting in a net increase of 23 beds, for a total of 123 beds in 4 buildings. Residential treatment space would increase 11%, from 66,394 to 73,462 square feet, and residential facilities would be modernized and updated. The location of the two new residential buildings and new Day Treatment building would be the same as described in Section 2.14.6, Population and Housing Project Impacts.

Patients would stay at the facility temporarily, generally for a maximum of 30 days. No patients would be expected to permanently relocate to Rancho Mirage a result of Alternative A.

Table 3.14-1
Alternative A - Existing vs. Proposed Housing

	Existing		Proposed		
Building Name	**Square Feet (approx.)**	**Beds**	**Square Feet (approx.)**	**Beds**	**Notes**
Fisher Hall	12,818	20	---	---	to be demolished
Pocklington Hall	12,894	20	---	---	to be demolished
McCallum Hall	12,988	20	---	---	to be demolished
North Hall	12,994	20	---	---	to be demolished
Ottenstein Hall	14,700	20	14,700	20	not affected by Alt. A
Residential Bldg. #1	---	---	23,250	35	to be built
Residential Bldg. #2	---	---	23,250	35	to be built
Day Treatment Building	---	---	12,262[1]	33	to be built
Total:	**66,394**	**100**	**73,462**	**123**	

[1] Includes treatment space. Does not include 6,399 square feet of administrative space.

Alternative A would generate new temporary construction jobs and longer-term jobs in fields such as health care, administration, and support services. Alternative A would result in 23 new beds. Based on the 0.37 employee to bed ratio assumed for the proposed Project (see Section 2.14), Alternative A would generate approximately 9 new long-term jobs. It could attract new workers from outside the region to permanently relocate to Rancho Mirage and/or surrounding communities. However, it is anticipated that most new jobs would be filled by the existing local labor force, and impacts on the housing supply, if any, would be very limited.

Under Alternative A, access to the HBFC campus would remain in its current condition, and no new access driveway would be built. Alternative A would not alter surrounding land use designations or result in the expansion of utility infrastructure and, as such, would not induce population growth.

Potential impacts of Alternative A on population growth would be less than significant.

Alternative A would result in the same level of impact (less than significant) on population growth as the proposed Project.

Alternative B (More Intense)

Less Than Significant Impact. As shown in Table 3.14-2, compared to existing conditions, Alternative B would remove 80 beds (due to demolition) and add 204 new beds (due to new construction), thereby resulting in a net increase of 124 beds, for a total of 224 beds in 4 buildings. Residential treatment space would increase 62%, from 66,394 to 107,700 square feet, and residential facilities would be modernized and updated. The location of the two new residential buildings and new Day Treatment building would be the same as described in Section 2.14.6, Population and Housing Project Impacts.

Patients would stay at the facility temporarily, generally for a maximum of 30 days. No patients would be expected to permanently relocate to Rancho Mirage a result of Alternative B.

Table 3.14-2
Alternative B - Existing vs. Proposed Housing

	Existing		Proposed		
Building Name	**Square Feet (approx.)**	**Beds**	**Square Feet (approx.)**	**Beds**	**Notes**
Fisher Hall	12,818	20	---	---	to be demolished
Pocklington Hall	12,894	20	---	---	to be demolished
McCallum Hall	12,988	20	---	---	to be demolished
North Hall	12,994	20	---	---	to be demolished
Ottenstein Hall	14,700	20	14,700	20	not affected by Alt. B
Residential Bldg. #1	---	---	46,500	69	to be built
Residential Bldg. #2	---	---	46,500	69	to be built
Day Treatment Building	---	---	24,523[1]	66	to be built
Total:	**66,394**	**100**	**107,700**	**224**	

[1] Includes treatment space. Does not include 6,399 square feet of administrative space.

Alternative B would generate new temporary construction jobs and longer-term jobs in fields such as health care, administration, and support services. Alternative B would generate 124 new beds. Based on the 0.37 employee to bed ratio used for the proposed Project (see Section 2.14), Alternative B would generate approximately 46 new employees. It could attract new workers from outside the region to permanently relocate to Rancho Mirage and/or surrounding communities; however, it is anticipated that most new jobs would be filled by the existing local labor force and impacts on the housing supply, if any, would be very limited.

Alternative B would include construction of a new access road between HBFC and Vista Del Sol that would serve as an additional entry/exit for the campus and would be limited in length. It would not alter surrounding land use designations or result in the expansion of utility infrastructure and, as such, would not induce population growth.

Potential impacts of Alternative B on population growth would be less than significant.

Alternative B would result in the same level of impact (less than significant) on population growth as the proposed Project.

Alternative C (No Project)

No Impact. Alternative C represents a continuation of existing conditions. No existing buildings would be demolished, and no new construction would occur. HBFC would continue to have 100 beds in 5 buildings totaling ±66,394 square feet of residential treatment space. Onsite facilities and grounds would continue to need renovating or modernizing. Patient capacity would not be expanded. No new jobs would be created, and no new access driveway would be constructed between HBFC and Vista Del Sol. No impacts associated with population growth would occur.

Alternative C would result in no impact on population growth, whereas the proposed Project would result in less a than significant impact.

b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

Alternative A (Less Intense)

No Impact. Alternative A would result in the demolition of 4 existing onsite residential treatment buildings and replacement with 2 new buildings that serve the same purpose, increase residential square footage, and increase patient capacity. It would not displace existing people or housing such that replacement housing would be required elsewhere.

Alternative A would result in the same level of impact (no impact) as the proposed Project.

Alternative B (More Intense)

No Impact. Alternative B would result in the demolition of 4 existing onsite residential treatment buildings and replacement with 2 new buildings serving the same purpose, increasing residential square footage, and increasing patient capacity. It would not displace existing people or housing such that replacement housing would be required elsewhere.

Alternative B would result in the same level of impact (no impact) as the proposed Project.

Alternative C (No Project)

No Impact. Alternative C represents a continuation of existing conditions. No people or housing would be displaced, and no replacement housing would be required elsewhere.

Alternative C would result in the same level of impact (no impact) as the proposed Project.

Environmental Justice

Alternative A (Less Intense)

There are no disadvantaged communities on the Project site or in the Project vicinity or Rancho Mirage. Therefore, Alternative A would have no impact on disadvantaged communities. No adverse social or economic impacts are anticipated as a result of Alternative A, including any that would disproportionately affect low-income or minority communities.

Alternative B (More Intense)

No impacts that would disproportionately affect low-income or minority communities are anticipated to result from implementation of Alternative B.

Alternative C (No Project)

Continued implementation of Alternative C is not expected to disproportionately impact low-income or minority communities. No impact would occur.

3.14.4 Mitigation Measures

None required.

3.14.5 Environmentally Superior Alternative

Alternative C would not result in demolition or new construction of new buildings or a new entry driveway. The number of patients, beds, and building square footage would remain the same as currently exist. No new employment would be generated and, therefore, there is no potential for workers from outside the region to relocate to Rancho Mirage or impact the existing housing supply. In this regard, Alternative C is the environmentally superior alternative.

However, Alternative C does not meet the Project objectives described in Section 1.3 of this DEIR. Specifically, as pertains to housing, Alternative C would not result in the replacement of older and outdated residential treatment buildings with modern, more efficient facilities. The proposed Project, Alternative A, and Alternative B meet the Project objectives, including the need for modern, more efficient facilities. Of those three alternatives, Alternative A, the Less Intense Alternative, would result in fewer square feet of new construction and the fewest patients onsite. As such, it would be the environmentally superior alternative.

3.15 Public Services

3.15.1 Introduction

This analysis evaluates the potential for the Project alternatives to directly affect public services during construction and operational phases. The analysis considers whether construction and/or operation of the alternatives would affect the ability of fire, police, school, park, or other public service providers to maintain acceptable service or other performance objectives and result in the need for new or expanded facilities.

3.15.2 Existing Conditions

The City of Rancho Mirage contracts with Riverside County Fire Department (RCFD) for fire protection services and Riverside County Sheriff's Department (RCSD) for police protection services. Desert Sands Unified School District (DSUSD) serves the Project area, and its facilities are currently slightly over capacity.

Please see Section 2.15.4 and Section 2.15.5 for a detailed description of existing conditions of public services.

3.15.3 Alternatives Impact Analysis

Would the Project:

a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

- ***Fire Protection***

Alternative A (Less Intense)

Less Than Significant. The Alternative A development scenario would result in 23 new patient beds, which is 33 fewer new beds than provided by the proposed Project. Construction of Alternative A would result in a marginal potential increase in fire and medical response demand. However, water connections will be available on the subject property for fire suppression purposes. In Section 2.15.6, it was estimated that there were 0.54 calls for fire protection services per room per year at the Betty Ford Center based on 2018-2019 Fire Department data. Based on this factor, Alternative A will result in approximately 67 calls for fire services per year, which is an additional 13 calls compared to the current call volume. The Fire Department responded to a total of 5,190 calls within the City of Rancho Mirage in 2018,[1] and Alternative A will result in an estimated 0.3% increase in the number of calls. Therefore, Alternative A is not expected to require the construction of new or physically altered fire facilities that might result in physical environmental impacts in order to maintain acceptable service performance objectives, and the impacts would be less than significant.

Alternative A does not propose a new access driveway from Vista Del Sol and will continue with the current indirect and circuitous access through the EMC campus. As discussed in Section 2.15.6, fire safety features would be incorporated in accordance with applicable RCFD fire safety codes and City regulations for construction, access, fire flows, and fire hydrants, and will require approval by the Fire Marshall to assure adequate access for emergency and fire equipment vehicles.

[1] Riverside County Fire Department Annual Report 2018.

Alternative A would be required to pay the fire facilities and equipment development impact fees that are charged on new development. Funding provided by Alternative A would result in capital for future fire facilities. Alternative-A-related impacts on fire protection services and facilities would be less than significant.

Alternative B (More Intense)

Less Than Significant. The Alternative B development scenario would result in 124 new patient beds, which is 68 more new beds than provided by the proposed Project. As discussed in Section 2.15.6, construction of Alternative B would result in a marginal potential increase in fire and medical response demand; however, water connections are available on the Project site for fire suppression purposes. In Section 2.15.6, it was estimated that there were 0.54 calls for fire protection services per room per year at the Betty Ford Center based on 2018-2019 Fire Department data. Based on this factor, Alternative B will result in approximately 67 calls for fire services per year, which is an additional 59 calls compared to the current call volume. The Fire Department responded to a total of 5,190 calls within the City of Rancho Mirage in 2018,[2] and Alternative B will result in an estimated 1.3% increase in the number of calls. Therefore, Alternative B is not expected to require the construction of new or physically altered fire facilities that might result in physical environmental impacts in order to maintain acceptable service performance objectives, and the impacts would be less than significant.

As with the proposed Project, Alternative B will result in a new primary access driveway onto the HBFC campus from Vista Del Sol. The new 24-30 feet wide driveway would proceed west into the campus and connect to the existing on-site circulation network. The driveway is expected to shorten emergency response times for incidents onsite. As discussed in Section 2.15.6, fire safety features would be incorporated in accordance with applicable RCFD fire safety codes and City regulations for construction, access, fire flows, and fire hydrants and will require approval by the Fire Marshall to assure adequate access for emergency and fire equipment vehicles.

Alternative B would be required to pay the fire facilities and equipment development impact fees that are charged on new development. Funding provided by Alternative B would result in capital for future fire facilities. Alternative-B-related impacts on fire protection services and facilities would be less than significant.

Alternative C (No Project)

No Impact. Alternative C will result in the continuation of existing conditions and will not require the construction of new or physically altered fire facilities that might result in physical environmental impacts in order to maintain acceptable service performance objectives. No impact would occur.

- ***Police Protection***

Alternative A (Less Intense)

Less Than Significant. Construction of Alternative A will result in a potential increase in the need for security to prevent theft or vandalism of construction activities and equipment. However, this potential impact can be minimized through compliance with standard safety measures, such as fencing and locking excavation, vehicle staging, and storage areas at the end of each workday, providing adequate nighttime lighting, minimizing "dead zones," and providing professional security personnel. With implementation of these measures, impacts associated with public safety during construction of Alternative A will be reduced to less than significant levels.

At buildout, Alternative A would result in an additional 23 patients and 9 employees onsite if fully occupied, thereby generating a potential increase in the level of police protection service calls from the subject property.

[2] Ibid.

Implementation of the following standards and measures will help reduce the potential increase in demand for police protection services.

i) Design and development of individual Alternative A components should incorporate elements of defensive design that enhance safety for patients and employees, while optimizing site surveillance by on-site security personnel. The City Planning Department and Riverside County Sheriff's Department will evaluate Alternative A development plans from a "defensible space" perspective, to include review of internal circulation, emergency access, and street/building names and numbering systems.

ii) Final project plans and maps should incorporate design refinements which limit unauthorized site access to the greatest extent practical. The placement of walls, fences, landscape deterrents, and surveillance equipment should optimize opportunities to frustrate and preclude unauthorized access.

iii) Security and emergency outdoor lighting and other security measures should be incorporated into the design of the development and individual structures to preclude unauthorized access and thereby reduce the need for police response.

As discussed in Section 2.15.6, it was not possible to compare or generalize the demand for police protection services to HBFC based on the data received from the Sheriff's Department. For analysis purposes, the demand for police protection services under Alternative A would be comparable to the demand for fire protection services discussed in the section above, especially in terms of calls and responses. Alternative A is not expected to require new or physically altered police facilities in order to maintain acceptable service ratios, response times, or other performance objectives with implementation of the aforementioned standard requirements and measures. Impacts would be less than significant.

Alternative B (More Intense)

Less Than Significant. Construction of Alternative B will result in a potential increase in the need for security to prevent theft or vandalism of construction activities and equipment. However, this potential impact can be minimized through compliance with standard safety measures, such as fencing and locking excavation, vehicle staging, and storage areas at the end of each workday, providing adequate nighttime lighting, minimizing "dead zones," and providing professional security personnel. With implementation of these measures, impacts associated with public safety during construction of Alternative B will be reduced to less than significant levels.

At buildout, Alternative B would result in an additional 124 patients and 46 employees onsite if fully occupied, thereby generating a potential increase in the level of police protection service calls from the subject property. As with the proposed Project and Alternative A, implementation of the standards and measures (i-iii) specified above will help reduce the potential increase in demand for police protection services.

As discussed in Section 2.15.6, it was not possible to compare or generalize the demand for police protection services to HBFC based on the data received from the Sheriff's Department. For analysis purposes, the demand for police protection services under Alternative B would be comparable to the demand for fire protection services discussed in the section above, especially in terms of calls and responses. Alternative B is not expected to require new or physically altered police facilities in order to maintain acceptable service ratios, response times, or other performance objectives with implementation of the aforementioned standard requirements and measures. Impacts would be less than significant.

Alternative C (No Project)

No Impact. Alternative C will result in the continuation of existing conditions and will not require the construction of new or physically altered police facilities that might result in physical environmental impacts in order to maintain acceptable service performance objectives. No impact would occur.

- ***Schools***

Alternative A (Less Intense)

Less Than Significant. The Alternative A development scenario would result in 9 new employees, a decrease of 12 employees compared to the proposed Project. While these new employees are expected to be primarily local residents, to provide a conservative analysis, it is assumed all 9 new employees will move to Rancho Mirage from outside communities and become new City residents. Potential student generation is estimated to be a maximum of five students (see Table 3.15-1 below, assuming 9 residential units). The potential student increase represents less than 0.02% of DSUSD's current student body (current enrollment at 28,610 students), and a decrease of four students compared to the proposed Project.

Table 3.15-1
Alternative A - Estimated Student Generation

School Type	Generation Rate (per residential unit)	Number of New Employees at Project Buildout	Project's Student Generation
Elementary School	0.1682	9	2
Middle School	0.0922	9	1
High School	0.1275	9	2
Total:			5

Source: Desert Sands Unified School District - Fee Justification Study for New Residential and Commercial/Industrial Development (May 2018) and Project materials.

As discussed in Section 2.15.6, Alternative A will be required to pay the mandated school mitigation fees imposed by the State for new construction. Based on the developer fees established by DSUSD, the Project would be required to pay $3.79 per square feet of residential development. Based on Section §65996 of the California Government Code, the payment of such fees is deemed to fully mitigate the impacts of new development on school services. Therefore, with payment of the required developer fees, impacts of Alternative A to school services would be less than significant.

Alternative B (More Intense)

Less Than Significant. The Alternative B development scenario would result in 46 new employees, an increase of 25 employees compared to the proposed Project. While these new employees are expected to be primarily local residents, to provide a conservative analysis, it is assumed all 46 new employees will move to Rancho Mirage from outside communities and become new City residents. Potential student generation is estimated to be a maximum of nineteen students (see Table 3.15-2 below, assuming 46 residential units). The potential student increase represents less than 0.1% of DSUSD's current student body (current enrollment at 28,610 students), and an increase of ten students compared to the proposed Project.

Table 3.15-2
Alternative B - Estimated Student Generation

School Type	Generation Rate (per residential unit)	Number of New Employees at Project Buildout	Project's Student Generation
Elementary School	0.1682	46	8
Middle School	0.0922	46	5
High School	0.1275	46	6
Total:			19

Source: Desert Sands Unified School District - Fee Justification Study for New Residential and Commercial/Industrial Development (May 2018) and Project materials.

As discussed in Section 2.15.6, Alternative B will be required to pay the mandated school mitigation fees imposed by the State for new construction. Based on the developer fees established by DSUSD, Alternative B would be required to pay $3.79 per square feet of residential development. Based on Section §65996 of the California Government Code, the payment of such fees is deemed to fully mitigate the impacts of new development on school services. Therefore, with payment of the required developer fees, impacts of Alternative B to school services would be less than significant.

Alternative C (No Project)

No Impact. Alternative C will result in the continuation of existing conditions. No new permanent residential units or students will be generated; therefore, it will not require the construction of new or physically altered school facilities that might result in physical environmental impacts in order to maintain acceptable service performance objectives. No impact would occur.

- ***Parks***

Alternative A (Less Intense)

Less Than Significant. Buildout of Alternative A will result in an estimated 9 additional employees, which are expected to be primarily local residents. To provide a conservative analysis, it is assumed all the 9 employees will move to Rancho Mirage from outside communities and become new City residents. New employees under Alternative A can be expected to increase the use of local and regional parks; however, the number of employees is limited (less than 0.1% of the City's 2019 population[3]), and no new or altered facilities would be required to serve them. New patients under Alternative A will be able to use an onsite swimming pool and generous landscaped areas with a pond, and additional features are proposed to enhance onsite amenities. Alternative A's landscaping design, in conjunction with the City's current parks and recreational facilities and the collection of park improvements development impact fees that support the City's park improvements fund (as required by Rancho Mirage Municipal Code 3.29.140), would be adequate to accommodate the demand under Alternative A for parks and recreational services. Therefore, Alternative-A-related impacts to parks would be less than significant.

[3] The population of Rancho Mirage was 18,489 in 2019 per Report E-5: City/County Population and Housing Estimates, January 1, 2019, California Department of Finance.

Alternative B (More Intense)

Less Than Significant. Buildout of Alternative B will result in an estimated 46 additional employees, which are expected to be primarily local residents. To provide a conservative analysis, it is assumed all the 46 employees will move to Rancho Mirage from outside communities and become new City residents. New employees under Alternative B can be expected to increase the use of local and regional parks; however, the number of employees is limited (less than 0.3% of the City's 2019 population[4]), and no new or altered facilities would be required to serve them. New patients under Alternative B will be able to use an onsite swimming pool and generous landscaped areas with a pond, and additional features are proposed to enhance onsite amenities. Alternative B's landscaping design, in conjunction with the City's current parks and recreational facilities and the collection of park improvements development impact fees that support the City's park improvements fund (as required by Rancho Mirage Municipal Code 3.29.140), would be adequate to accommodate the demand under Alternative B for parks and recreational services. Therefore, Alternative-B-related impacts to parks would be less than significant.

Alternative C (No Project)

No Impact. Alternative C will result in the continuation of existing conditions and will not require the construction of new or physically altered parks that might result in physical environmental impacts in order to maintain acceptable service performance objectives. No impact would occur.

- ***Other Public Facilities***

Alternative A (Less Intense)

Less Than Significant. As discussed in Section 2.15.6, the additional patients and employees at buildout of Alternative A are expected to spend the most time on campus. However, some may attend the local library or other public facilities, and few may require medical services at other local facilities. However, such visits are expected to be minimal and are not expected to require new or expanded facilities that could result in adverse environmental impacts. Alternative-A-related impacts to other public facilities will be less than significant.

Alternative B (More Intense)

Less Than Significant. As discussed in Section 2.15.6 and above, the additional patients and employees at buildout of Alternative B are expected to spend the most time on campus. However, some may attend the local library or other public facilities, and few may require medical services at other local facilities. However, such visits are expected to be minimal and are not expected to require new or expanded facilities that could result in adverse environmental impacts. Alternative-B-related impacts to other public facilities will be less than significant.

Alternative C (No Project)

No Impact. Alternative C will result in the continuation of existing conditions and will not require the construction of new or physically altered public facilities that might result in physical environmental impacts in order to maintain acceptable service performance objectives. No impact would occur.

[4] Ibid.

3.15.4 Mitigation Measures

Impacts will be less than significant. No mitigation measures are required.

3.15.5 Environmental Superior Alternative

With regard to impacts on public services and facilities, Alternative C (No Project) is superior to the three "build" alternatives because it will not result in new patients or employees and, thus, no new impacts on public services would occur. Of the three "build" alternatives, the less intense Alternative A would result in the lowest level of impacts because it would generate the least number of additional patients and employees.

3.16 Transportation and Traffic

3.16.1 Introduction

This section describes the existing circulation system in the Project area and analyzes the potential transportation-related impacts associated with the Project alternatives.

3.16.2 Existing Conditions

Principal arterials in the Project planning area are Country Club Drive and Bob Hope Drive. Other key roadways in the Project area include Vista Del Sol and John L. Sinn Road, as well as roads providing internal access within the EMC and HBFC campuses, including Emergency Room Access Road (also known as MacMillan Way), Betty Ford Way, Street A, and Joe Friend Lane.

SunLine Transit Agency Route 32 extends along Bob Hope Drive and Country Club Drive in the immediate Project vicinity. Bus stops are located on both sides of Bob Hope Drive at the EMC main entrance, both sides of Country Club Drive at John L. Sinn Road, and on the north side of Country Club Drive approximately 800 feet east of Vista Del Sol. In the Project area, sidewalks are located on the east side of Bob Hope Drive, both sides of Country Club Drive, and within the EMC and HBFC campuses. Shared bicycle lanes are on both sides of Bob Hope Drive and Country Club Drive. Parking lots are located throughout the EMC and HBFC campuses.

The Project-specific Traffic Impact Analysis (Appendix H of this DEIR) studied seven (7) existing intersections in the Project planning area. It determined that all seven currently operate at an acceptable Level of Service (LOS) during the peak hours except for the intersection of Bob Hope Drive and Street A (Intersection #2), which operates at LOS E during the PM peak hour only. In addition, the following two study area intersections currently warrant a traffic signal based on existing peak hour flows:

1) Bob Hope Drive & MacMillan Way/Emergency Room Access Rd. (Intersection #1), and
2) Bob Hope Drive & Street A (Intersection #2).

3.16.3 Alternatives Impact Analysis

Would the Project:

a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

Alternative A (Less Intense)

Less Than Significant Impact with Mitigation.

LOS Policy: The Project-specific Traffic Impact Analysis estimated that Alternative A would generate 270 new daily vehicle trip-ends. This represents 292 fewer (52% fewer) daily trip-ends than the proposed Project. Alternative A's contributions to intersection delays and deficiencies would be less than the proposed Project's; however, like the proposed Project, mitigation for LOS impacts would be required in the form of a fair-share percentage of costs for a future traffic signal at Intersection #2 (Mitigation Measure CIR-1, as described in Section 2.16.7).

Site Access Improvements: Alternative A would not result in construction of a new access driveway between HBFC and Vista Del Sol, and would have no direct impact on traffic volumes on Vista Del Sol. All new Project-related daily vehicle trips would be distributed to Betty Ford Way, John L. Sinn Road, Joe Friend Lane, Street A, Bob Hope Drive, and Country Club Drive. No modifications or improvements to Vista Del Sol would occur, and no mitigation measures associated with Vista Del Sol would be required. Like the proposed Project, Alternative A would result in a new parking lot in the northeasterly portion of the project area. Mitigation Measures CIR-4 and CIR-5 (described in Section 2.16.7) would assure that signage, striping, and sight distances reduce potential impacts to less than significant levels.

Transit, Bicycle, and Pedestrian Facilities: Alternative A would include new internal sidewalks for pedestrian access between onsite campus buildings and parking lots. No other impacts to transit, bicycle, or pedestrian facilities would occur or be required. No impact would occur.

Alternative B (More Intense)

Less Than Significant Impact with Mitigation.

LOS Policy: The Project-specific Traffic Impact Analysis estimated that Alternative B would generate 1,164 new daily vehicle trip-ends. This represents 602 more (107% more) daily trip-ends than the proposed Project. Alternative B's contributions to intersection delays and deficiencies would be greater than the proposed Project's. Like the proposed Project, mitigation for LOS impacts would be required in the form of a fair-share percentage of costs for a future traffic signal at Intersection #2 (Mitigation Measure CIR-1, described in Section 2.16.7). Other intersections in the study area are currently (2019) operating at LOS C or above, and additional vehicle trip-ends generated by Alternative B are not expected to be sufficient so as to cause unacceptable LOS conditions at other intersections.

Site Access Improvements: Alternative B would result in construction of a new access driveway between HBFC and Vista Del Sol, and would increase traffic volumes on Vista Del Sol. Assuming the same trip distribution assumptions used for the proposed Project, 50% (582) of Alternative B daily trip-ends would use Vista Del Sol. The Rancho Mirage General Plan Circulation Element classifies Vista Del Sol as a Local Street, and Local Streets have a design capacity of 12,000 vehicles per day, depending on roadway conditions, number of access points, and other factors. Alternative B's additional vehicle trips on Vista Del Sol would represent ±9.7% of Vista Del Sol's buildout capacity. The addition of Alternative B trips on Vista Del Sol would not exceed the design capacity of Vista Del Sol or any other local roadway affected by Alternative B. Impacts would be less than significant. Nonetheless, new street and roadway improvements must be consistent with General Plan policies and other City standards. Implementation of CIR-2 through CIR-5 would assure that Vista Del Sol would be improved to its ultimate half-section width, an adequate signage and striping program would be implemented, and sight distances would be reviewed for consistency with applicable standards. With mitigation, Alternative B impacts would be less than significant.

Transit, Bicycle, and Pedestrian Facilities: Alternative B would include new internal sidewalks for pedestrian access between onsite campus buildings and parking lots. No other impacts to transit, bicycle, or pedestrian facilities would occur or be required. No impact would occur.

Alternative C (No Project)

No Impact.

LOS Policy: Under Alternative C, existing (2019) trip generation and LOS operations at intersections in the planning area would remain unchanged. No impacts would occur, and no mitigation would be required.

Site Access Improvements: Alternative C would not result in construction of a new access driveway between HBFC and Vista Del Sol, and would have no direct impact on traffic volumes on Vista Del Sol. All daily vehicle trips would continue to be distributed to Betty Ford Way, John L. Sinn Road, Joe Friend Lane, Street A, Bob Hope Drive, and Country Club Drive. No modifications or improvements to Vista Del Sol would occur, and no mitigation measures would be required.

Transit, Bicycle, and Pedestrian Facilities: Under Alternative C, existing transit, bicycle, or pedestrian facilities would remain the same as current conditions. No impact would occur.

Comparison to Proposed Project: Alternative C would have no impact on programs, plans, or policies addressing the circulation system, while the proposed Project would result in less than significant impacts with mitigation.

b) Conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)?

As discussed in Section 2.16, CEQA Guidelines Section 15064.3 subdivision (b) states that for land use projects (such as the proposed Project and Alternatives A, B, and C), "vehicle miles traveled exceeding an applicable threshold of significance may indicate a significant impact. Generally, projects within one-half mile of either an existing major transit stop or stop along an existing high-quality transit corridor should be presumed to cause a less than significant transportation impact."

Alternative A (Less Intense)

Less Than Significant Impact. Compared to existing conditions, Alternative A would increase trip generation and, therefore, would be expected to increase vehicle miles traveled (VMT). The City does not have an applicable threshold of significance for VMTs. However, Alternative A is within ½-mile of SunLine Transit Agency's fixed bus Route 32 that extends along Bob Hope Drive west of the Project site and Country Club Drive to the south. Route 32 operates during the morning and afternoon peak commuting periods, and existing bus stops are located in the immediate Project area. Transit use by HBFC employees, patients, and/or visitors would be expected to reduce VMTs generated by Alternative A. Alternative A would not conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b), and impacts would be less than significant.

Alternative A and the proposed Project would result in the same level of impact.

Alternative B (More Intense)

Less Than Significant Impact. Compared to existing conditions, Alternative B would increase trip generation and, therefore, would be expected to increase VMTs. The City does not have an applicable threshold of significance for VMTs. However, Alternative B is located within ½-mile of SunLine Transit Agency's fixed bus Route 32 that extends along Bob Hope Drive west of the Project site and Country Club Drive to the south. Route 32 operates during the morning and afternoon peak commuting periods, and existing bus stops are located in the immediate Project area. Transit use by employees, patients, and/or visitors would be expected to reduce VMTs generated by Alternative B. Alternative B would not conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b), and impacts would be less than significant.

Alternative B and the proposed Project would result in the same level of impact.

Alternative C (No Project)

Less Than Significant Impact. Under Alternative C, existing VMTs would remain unchanged. The HBFC campus is within ½-mile of an existing high-quality transit corridor and transit stops. Due to its proximity to such resources, Alternative C would not conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b), and impacts would be less than significant.

Alternative C and the proposed Project would result in the same level of impact.

c) hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Alternative A (Less Intense)

No Impact. Alternative A does not propose a hazardous geometric design feature, and the anticipated vehicle mix would be compatible with existing vehicles in the vicinity. No impact would occur.

Alternative A and the proposed Project would result in the same level of impact.

Alternative B (More Intense)

No Impact. Alternative B does not propose a hazardous geometric design feature. The new access driveway between the HBFC campus and Vista Del Sol, and improvements to Vista Del Sol itself, would be required to comply with General Plan Circulation Element policies and applicable City roadway improvement standards. The anticipated vehicle mix would be compatible with existing vehicles. No impact would occur.

Alternative B and the proposed Project would result in the same level of impact.

Alternative C (No Project)

No Impact. Alternative C represents a continuation of existing conditions. No hazardous geometric design features would be built, and no change to the existing vehicle mix would occur. No impact would occur.

Alternative C and the proposed Project would result in the same level of impact.

d) Result in inadequate emergency access?

Alternative A (Less Intense)

Less Than Significant Impact. Alternative A would not result in the construction of a new access driveway on Vista Del Sol, and existing emergency access would continue to be provided via the current circuitous route through the EMC campus from either John L. Sinn Road or Bob Hope Drive, thence along Betty Ford Way. No improvements to emergency access would occur, and no worsening of emergency access compared to existing conditions is anticipated. Impacts would be less than significant.

Alternative A and the proposed Project would result in the same level of impact, but the benefits of improved site access via a new driveway on Vista Del Sol would not be realized under Alternative A.

Alternative B (More Intense)

Less Than Significant Impact. Alternative B would add a new access driveway on Vista Del Sol, which would provide another emergency access route to the HBFC campus and direct connection between Country Club Drive on the south and Frank Sinatra Drive on the north. The new HBFC Vista Del Sol access drive would not be available to or be used by EMC-bound emergency vehicles. Impacts would be beneficial and less than significant.

Alternative B and the proposed Project would result in the same level of impact.

Alternative C (No Project)

Less Than Significant Impact. Under Alternative C, emergency access to the subject property would remain the same as currently exists, via the existing circuitous route through the EMC campus from either John L. Sinn Road or Bob Hope Drive, thence along Betty Ford Way. No new access driveway on Vista Del Sol would be built. Emergency access would not worsen or improve under Alternative C.

Alternative C and the proposed Project would result in the same level of impact, but the benefits of improved site access via a new driveway on Vista Del Sol would not be realized under Alternative C.

3.16.4 Mitigation Measures

Alternative A would require implementation of mitigation measures CIR-1, CIR-4, CIR-5 and CIR-6, described in Section 2.16.7, to reduce potential impacts to less than significant levels. (CIR-2 and CIR-3 would not apply to Alternative A because Alternative A does not propose a new access driveway or Vista Del Sol improvements.)

Like the proposed Project, Alternative B would require implementation of CIR-1 through CIR-6. With mitigation, impacts would be less than significant.

Alternative C would not require any mitigation.

3.16.5 Environmental Superior Alternative

Alternative C would be the environmentally superior alternative because it would not contribute additional vehicle trips or VMTs to the local or regional roadway network, and it would not contribute to additional delays at area intersections. No new traffic signals or other roadway improvements would be built or required for mitigation.

Of the three “build” alternatives, Alternative A would be the environmentally superior alternative. It would generate the fewest new vehicle trips, contribute to fewer intersection delays, and avoid construction of a new access driveway and modifications to Vista Del Sol. However, it would not improve access to the HBFC campus; the campus would continue to be accessed through a circuitous route through the EMC campus.

3.17 Utilities and Service Systems

3.17.1 Introduction

This section describes potential impacts on utilities and service systems that could occur as a result of implementing the Project alternatives, and analyzes the level of impact the alternatives would have on these resources. Utilities and service systems discussed in this section include water, wastewater service, solid waste facilities, electricity, and natural gas.

3.17.2 Existing Conditions

The Project site encompasses 26.22± acres and consists of the existing Betty Ford Campus and 6.53± acres of undeveloped land. The Project site is located in the urban area of the City of Rancho Mirage and well served by the utilities network. Given that all alternatives occur on the same site as the proposed Project, the regulatory framework, environmental setting and existing condition analysis provided in Section 2.17 also applies to all alternatives analyzed below. Please see Section 2.17.4 and Section 2.17.5 for a detailed description of existing utilities and services conditions.

3.17.3 Alternatives Impact Analysis

Would the Project:

a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects. (see Section 2.10 addressing stormwater)

b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years.

c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments.

Alternative A (Less Intense)

Less Than Significant Impact.

Domestic Water Supply
As discussed in Section 3.10, Hydrology and Water Quality, Alternative A would require approximately 23.49 AF of additional water annually. Approximately 15.62 AFY of the 23.49 AFY would be irrigation water, the demand for which will be partially met through the existing pond and recycled cooling tower water system. The net total Alternative A water demand of 23.49 AFY represents approximately 0.02 percent of the total water supply (114,600 AFY) for 2020 and 0.01 percent of the total water supply (194,300 AFY) for 2040.[1] A comparison of existing available water supplies and the water needs of Alternative A demonstrates that CVWD has sufficient water supplies available to serve Alternative A in the future during normal, dry, and multiple dry years.

[1] 114,600 AFY for 2020 and 194,300 AFY for 2040 are provided in the Coachella Valley Water District Urban Water Management Plan, prepared by MWH, July 1, 2016.

Alternative A's incremental effect would not be cumulatively considerable with respect to water supply and, therefore, impacts would be less than significant.

Domestic Water Infrastructure

Existing CVWD domestic water lines (12" in diameter) run along the easterly boundary of the existing HBFC campus and within the Roxbury Dr right-of-way on the southerly boundary of the subject property. There is also a water line (6"-10") along the easterly boundary of the subject property within right-of-way on Vista Del Sol. There are no public wells onsite; the closest one is approximately 200 feet north of the subject property next to the northeast corner of the Eisenhower Medical Center campus.

Alternative A will require extension of water lines within the site to connect to the existing CVWD water lines around the subject property. Extension of water lines will have less than significant impacts on expanded water services because the physical expansion will be limited within the site and the Vista Del Sol rights-of-way, and because Alternative A is replacing old buildings with more water-efficient new buildings and reducing turf area by using drought-tolerant desert landscaping.

Wastewater Services and Infrastructure

Existing CVWD wastewater pipelines (12" in diameter) are located east of the pond onsite, within the Roxbury Drive right-of-way on the southerly boundary of the subject property, and through the eastern portion of the subject site. A 15" PVC sewer main has been proposed along Vista Del Sol to connect to the existing 24" sewer main along Country Club Drive in the Section 31 Specific Plan.

Alternative A will result in 23 new patient beds, thus generating an additional 1,150 gallons of wastewater per day (based on 200 gallons per day for a four-person residence[2]) at buildout. Considering that water efficiency improvements in the new buildings will also reduce wastewater generation, the 1,150-gallon wastewater generation projection may be an overestimate. Current average annual flow at WRP-10 is 10.8 mgd, and the CVWD 2010 Urban Water Management Plan projects wastewater treatment at WRP-10 to 15.53 million gallons per day (mgd) in year 2045. As such, Alternative A's net wastewater generation of 1,150 gallons per day would account for approximately 0.01% of current average flow, and 0.007% of year 2045 average flow. The wastewater generation under Alternative A will be adequately served by existing facilities and will not require or result in the relocation or construction of new or expanded wastewater treatment facilities. Impacts would be less than significant.

Stormwater Drainage

Alternative A would introduce impervious surfaces in the Project area through the construction of buildings, pedestrian pathways, parking lots, and internal roadways. As explained in Section 2.10, Hydrology and Water Quality, to fully capture the 100-year storm runoff at buildout, two retention basins will be built on either side of the new access road at the south side of the site (Exhibit 1-5). As discussed in the preliminary hydrology study and Section 2.10, the design of the drainage systems has capacity to accommodate Alternative A 100-year flows. Therefore, Alternative A will not result in a need to construct additional drainage facilities beyond those designed onsite, and impacts will be less than significant.

Electric Power

Existing SCE distribution lines (12kV) are located in proximity to the subject property, bordering the EMC campus along MacMillan Way (also known as Emergency Room Access Road) and Vista Del Sol toward Country Club Drive. The current electricity demand of the Betty Ford Center is adequately served by SCE. Buildout of Alternative A would consume an estimated additional 208,642 kWh electricity per year.[3] Alternative A's

[2] Coachella Valley Water District Sewer Service Rate Study Report, prepared by Stantec, May 16, 2017.

[3] See Section 2.12 Minerals and Energy for detailed discussion. Annual kWh was estimated based on CalEEMod outputs using historical energy data for similar land use/building types and Project-specific building data.

electricity demand would represent a less than 0.1 percent increase in annual City-wide kWh usage. Alternative A will connect to the nearest existing SCE underground distribution lines located east of the site. Construction of Alternative A will comply with applicable SCE guidelines regarding installation, extensions, and connections to limit impacts to electricity infrastructure and avoid service interruptions. No new SCE electric power facilities will need to be constructed or relocated. Impacts will be less than significant.

Natural Gas

In the Project area, existing underground high-pressure distribution lines are located along Frank Sinatra Drive westbound to Vista Del Sol, then southbound to and along MacMillan Way bordering the EMC campus north of the subject property. Onsite gas lines run along the north and west sides of Dupont Hall (to be demolished) and north side of the pool. Prior to ground disturbance, contractors would notify and coordinate with SoCalGas to identify the locations and depths of all existing gas lines and avoid disruption of gas service.

According to the CalEEMod outputs, at buildout, Alternative A would consume an additional 6,966 therms per year of natural gas,[4] which is a less than 0.1 percent increase in annual City-wide usage (City-wide usage was 10,593,308 therms in 2010 according to the Rancho Mirage Energy Action Plan[5]). No additional natural gas facilities will need to be constructed or relocated. Impacts will be less than significant.

Telecommunication

The City is located within Frontier Communications' service area for telecommunication services. Alternative A will connect to the existing telecommunication lines. Lines currently in place are sufficient to provide service to Alternative A, and no new lines are expected to be required. No impact is anticipated.

Alternative B (More Intense)

Less Than Significant Impact.

Domestic Water Supply

As discussed in Section 3.10, Hydrology and Water Quality, Alternative B would require approximately 36.81 AF of additional water annually. Approximately 15.62 AFY of the 36.81 AFY would be Irrigation water, the demand for which will be partially met through the existing pond and recycled cooling tower water system. The net total Alternative B water demand of 36.81 AFY represents approximately 0.03 percent of the total water supply (114,600 AFY) for 2020 and 0.02 percent of the total water supply (194,300 AFY) for 2040.[6] A comparison of existing available water supplies and the water needs of Alternative B demonstrates that CVWD has sufficient water supplies available to serve Alternative B in the future during normal, dry, and multiple dry years. Alternative B's incremental effect would not be cumulatively considerable with respect to water supply and, therefore, impacts would be less than significant.

Domestic Water Infrastructure

As with the proposed Project and Alternative A, Alternative B will require extension of water lines within the site to connect to the existing CVWD water lines around the subject property. Extension of water lines will have less than significant impacts on expanded water services because the physical expansion will be limited within the site and the Vista Del Sol rights-of-way, and because Alternative B is replacing old buildings with more water-efficient new buildings and reducing turf area by using drought-tolerant desert landscaping.

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4 See Section 2.12 Minerals and Energy for detailed discussion. Annual kWh was estimated based on CalEEMod outputs using historical energy data for similar land use/building types and Project-specific building data.

5 Rancho Mirage Energy Action Plan 2013.

6 114,600 AFY for 2020 and 194,300 AFY for 2040 are provided in the Coachella Valley Water District Urban Water Management Plan, prepared by MWH, July 1, 2016.

Wastewater Services and Infrastructure

Alternative B will result in 124 additional beds in patient capacity, thus generating an additional 6,200 gallons of wastewater per day (based on 200 gallons per day for a four-person residence[7]) at buildout. Considering that water efficiency improvements in the new buildings will also reduce wastewater generation, the additional wastewater generation may be an overestimate. Current average annual flow at WRP-10 is 10.8 mgd, and the CVWD 2010 Urban Water Management Plan projects wastewater treatment at WRP-10 to be 15.53 million gallons per day (mgd) in year 2045. As such, Alternative B's net wastewater generation of 6,200 gallons per day would account for approximately 0.06% of current average flow, and less than 0.04% of year 2045 average flow. The wastewater generation under Alternative B will be adequately served by existing facilities and will not require or result in the relocation or construction of new or expanded wastewater treatment facilities. Impacts would be less than significant.

Stormwater Drainage

Alternative B would introduce impervious surfaces in the Project area through the construction of buildings, pedestrian pathways, parking lots, and internal roadways. As explained in Section 2.10, Hydrology and Water Quality, to fully capture the 100-year storm runoff at buildout, two retention basins will be built on either side of the new access road at the south side of the site (Exhibit 1-5). As discussed in the preliminary hydrology study and Section 2.10, the design of the drainage systems has capacity to accommodate Alternative B 100-year flows. Therefore, Alternative B will not result in a need to construct additional drainage facilities beyond those designed onsite, and impacts will be less than significant.

Electric Power

Existing SCE distribution lines (12kV) are located in proximity to the subject property, bordering the EMC campus along MacMillan Way and along Vista Del Sol toward Country Club Drive. The current electricity demand of the Betty Ford Center is adequately serviced by SCE. Buildout of Alternative B would consume an estimated additional 1,178,542 kWh electricity per year.[8] Alternative B's electricity demand would represent a less than 0.6 percent increase in annual City-wide kWh usage. Alternative B will connect to the nearest existing SCE underground distribution lines located east of the site. Construction of Alternative B will comply with applicable SCE guidelines regarding installation, extensions, and connections to limit impacts to electricity infrastructure and avoid service interruptions. No new SCE electric power facilities will need to be constructed or relocated. Impacts will be less than significant.

Natural Gas

As discussed in Section 2.17.6 and above, onsite gas lines run along the north and west sides of Dupont Hall (to be demolished) and the north side of the pool. Prior to ground disturbance, contractors would notify and coordinate with SoCalGas to identify the locations and depths of all existing gas lines and avoid disruption of gas service.

At buildout, Alternative B would consume an additional 37,361 therms per year of natural gas,[9] which is a less than 0.4 percent increase in annual City-wide usage (City-wide usage was 10,593,308 therms in 2010 according to the Rancho Mirage Energy Action Plan[10]). No additional natural gas facilities will need to be constructed or relocated. Impacts will be less than significant.

7 Coachella Valley Water District Sewer Service Rate Study Report, prepared by Stantec, May 16, 2017.
8 See Section 2.12 Minerals and Energy for detailed discussion. Annual kWh was estimated based on CalEEMod outputs using historical energy data for similar land use/building types and Project-specific building data.
9 See Section 2.12 Minerals and Energy for detailed discussion.
10 Rancho Mirage Energy Action Plan 2013.

Telecommunication
The City is located within Frontier Communications' service area for telecommunication services. Alternative B will connect to the existing telecommunication lines. Lines currently in place are sufficient to provide service to Alternative B, and no new lines are expected to be required. No impact is anticipated.

Alternative C (No Project)

No Impact.

Alternative C will result in the continuation of existing conditions. Utilities demand at the Betty Ford Center is not expected to change. No relocation or construction of new or expanded water, wastewater treatment, or storm water drainage, electric power, natural gas, or telecommunications facilities would be required. No new impact regarding water supply and wastewater service would occur.

d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals.

e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste.

Alternative A (Less Intense)

Less Than Significant Impact.

Construction Impacts
Construction of Alternative A would generate solid waste in the form of trash and debris, asphalt and concrete waste, and similar materials. All construction debris would be placed in appropriate onsite containers and periodically disposed of in accordance with all applicable standards of waste disposal. Non-hazardous construction materials that cannot be reused or recycled would be accepted for disposal at municipal Riverside County landfills. As required by CalGreen, demolition of the existing parking lot and the waste created by construction activities will need to be recycled. This standard requirement will assure that impacts associated with construction waste remain less than significant.

Any hazardous materials (e.g. chemicals, oils fuels, lubricants, paints, and solvents) used during construction would be recycled, treated, and/or disposed of in accordance with federal, State, and local laws (See Section 2.9, Hazards and Hazardous Materials). Construction-related solid waste generation will be finite, and regional landfills would have sufficient permitted capacity to accommodate the Alternative A's construction-related solid waste disposal needs. Impacts will be less than significant.

Operational Impacts
Based on the Estimated Solid Waste Generation Rates established by CalRecycle, Alternative A would dispose of an additional maximum of 8.4 tons of solid waste per year[11] at buildout by adding 23 new patients/beds. Alternative A would be required to achieve 50 percent waste diversion in accordance with Riverside County's Integrated Waste Management Plan (CIWMP); based on this requirement, the total solid waste generation for Alternative A will be approximately 4.2 tons per year.

[11] Hotel = 2 lb/room/day, CalRecycle.

Solid waste collected from the site will be hauled to the Edom Hill Transfer Station in Cathedral City and then transported to Lamb Canyon Landfill or Badlands Landfill. Alternative A will contribute approximately 0.001 percent or less to Badlands' or Lamb Canyon's remaining capacity as of 2015.[12][13] Recyclable materials (e.g., paper, plastic, glass, cardboard, aluminum) will be transported to Burrtec's material recovery facilities for recycling and reuse. Less than significant impacts would occur from Alternative A, and no mitigation will be required.

Alternative B (More Intense)

Less Than Significant Impact.

Construction Impacts

Construction of Alternative B would generate solid waste in the form of trash and debris, asphalt and concrete waste, and similar materials. All construction debris would be placed in appropriate onsite containers and periodically disposed of in accordance with all applicable standards of waste disposal. Non-hazardous construction materials that cannot be reused or recycled would be accepted for disposal at municipal Riverside County landfills. As required by CalGreen, demolition of the existing parking lot and the waste created by construction activities will need to be recycled. This standard requirement will assure that impacts associated with construction waste remain less than significant.

Any hazardous materials (e.g. chemicals, oils fuels, lubricants, paints, and solvents) used during construction would be recycled, treated, and/or disposed of in accordance with federal, State, and local laws (See Section 2.9, Hazards and Hazardous Materials). Construction-related solid waste generation will be finite, and regional landfills would have sufficient permitted capacity to accommodate the Alternative B's construction-related solid waste disposal needs. Impacts will be less than significant.

Operational Impacts

Based on the Estimated Solid Waste Generation Rates established by CalRecycle, Alternative B would dispose of an additional maximum of 45.26 tons of solid waste per year[14] at buildout by adding 124 patients/beds. Alternative B would be required to achieve 50 percent waste diversion in accordance with Riverside County's Integrated Waste Management Plan (CIWMP); based on this requirement, the total solid waste generation for Alternative B will be approximately 22.63 tons per year.

Solid waste collected from the site will be hauled to the Edom Hill Transfer Station in Cathedral City and then transported to Lamb Canyon Landfill or Badlands Landfill. Alternative B will contribute approximately 0.006 or 0.005 percent to Badlands' or Lamb Canyon's remaining capacity, respectively as of 2015.[15][16] Recyclable materials (e.g., paper, plastic, glass, cardboard, aluminum) will be transported to Burrtec's material recovery facilities for recycling and reuse. Less than significant impacts would occur from Alternative B, and no mitigation will be required.

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12 Assumes that 1 CY of commercial and residential recyclable solid waste is equivalent to 100 lbs (averaged). "Volume to Weight Conversion Factors," US EPA Office of Resource Conversion and Recovery. April 2016.

13 Remaining capacity is 15,748,799 Cubic Yards and 19,242,950 Cubic Yards for Badlands Landfill and Lamb Canyon Landfill, respectively as of 2015. CalRecycle Solid Waste Information System (SWIS) Facility Detail, accessed February 4, 2020.

14 Hotel = 2 lb/room/day, CalRecycle.

15 Assumes that 1 CY of commercial and residential recyclable solid waste is equivalent to 100 lbs (averaged). "Volume to Weight Conversion Factors," US EPA Office of Resource Conversion and Recovery. April 2016.

16 Remaining capacity is 15,748,799 Cubic Yards and 19,242,950 Cubic Yards for Badlands Landfill and Lamb Canyon Landfill, respectively as of 2015. CalRecycle Solid Waste Information System (SWIS) Facility Detail, accessed February 4, 2020.

Alternative C (No Project)

No Impact.

Alternative C will result in the continuation of existing conditions. No construction would occur, and no construction-related waste would be generated. The operational waste generation is not expected to change from current conditions. The Betty Ford Center will continue to comply with federal, state, and local management and reduction statutes and regulations related to solid waste.

3.17.4 Mitigation Measures

No mitigation measures would be required for all three Alternatives as there would be no or less than significant impacts on utilities and service systems.

3.17.5 Environmental Superior Alternative

With regard to potential impacts on utilities and service systems, Alternative C (No Project) is superior to the three "build" alternatives because it would not generate new demand for utilities and services. Among the three "build" alternatives, Alternative A would be the environmentally superior alternative because it would result in the least additional demand for utilities and services.

3.18 Environmentally Superior Alternative Summary and Findings

Based on the analysis contained within this section, the environmentally superior project alternative is determined to be Alternative A, the Less Intense buildout scenario (per CEQA 15126.6). Although Alternative C, the No Project alternative, would result in fewer residual environmental impacts than the Proposed Project, this alternative would not meet the purpose or goals of the HBFC PDP Project for the following reasons:

- Alternative C would not replace older and outdated residential treatment buildings with modern, more efficient facilities,
- Alternative C would not provide broadened capabilities including a new stand-alone day-treatment facility
- Alternative C would not provide a new primary access from Vista Del Sol with appropriate entry and arrival statement
- Alternative C would not renovate site landscaping with increased use of desert and drought-tolerant landscape materials
- Alternative C would no further enhance the Center's ability to meet the changing regimens for treating patients with a substance use disorder

Overall, the proposed Project and Alternative B will generally have greater impacts compared to Alternative A due to the increased building intensities.

Tabled 3.18-1
Environmentally Superior
Development Alternative Comparison

Environmental Issue	Environmentally Superior			
	Proposed Project	**Alternative A**	**Alternative B**	**Alternative C**
Aesthetics		X		--
Air Quality		X		--
Biological Resources	Equivalent for all scenarios – full site disturbance			--
Cultural & Tribal Resources	Equivalent for all scenarios – full site disturbance			--
Geology and Soils		X		--
Greenhouse Gas Emissions		X		--
Hazards and Hazardous Materials		X		--
Hydrology and Water Quality		X		--
Land Use and Planning		X		--
Minerals and Energy		X		--
Noise		X		--
Population and Housing		X		--
Public Services		X		--
Transportation and Traffic		X		--
Utilities and Service Systems		X		--

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4. UNAVOIDABLE SIGNIFICANT IMPACTS

Introduction

Unavoidable significant impacts are those that cannot be reduced to acceptable or insignificant levels by the implementation mitigation measures. Impacts associated with development of the HBFC PDP Project are addressed in detail in Section 2 of this EIR. Comprehensive mitigation measures, as well as monitoring and reporting programs, have been developed to address potential impacts. The mitigation measures set forth in this Draft EIR will demonstrably and effectively reduce all potentially significant impacts to levels of insignificance. Therefore, there are no unavoidable significant impacts caused by the HBFC PDP Project.

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5. IRREVERSIBLE COMMITMENT OF RESOURCES

As required by CEQA Section 15126.2(c), this section of the EIR addresses the potentially significant irreversible environmental changes to, or loss of non-renewable resources that could occur from implementation of the proposed Project. In general, non-renewable resources imply fossil-based energy resources, but may also pertain to the permanent loss of agricultural, biological, mineral, and other natural resources. The use of non-renewable resources during short-term construction and long-term operation of the proposed Project may be irreversible and irretrievable.

The development of the Project will result in the irretrievable and irreversible commitment of non-renewable natural resources, including energy resources such as petroleum and natural gas, water resources, and mineral resources used for construction materials, such as concrete and steel.

Construction of the proposed Project will result in the permanent loss of fossil fuels through the consumption of coal, petroleum or natural gas for the manufacture of steel, Portland Cement and concrete, and to fuel construction and maintenance vehicles. As detailed in Section 2.12, the construction of proposed Project could result in electricity demand associated with power tools and security lighting, but electricity will not be the primary source of power during the construction of the proposed Project. Diesel fuel and gasoline for equipment operation and worker vehicle trips will be the primary energy source during construction. Because construction equipment and workers are expected to come from local sources, it is expected that the use of fuel is already occurring for other projects and worker trips in the Coachella Valley, and this use will, therefore, not be excessive or wasteful.

On-going operation of the proposed Project will generate demand for approximately 521,146 kWh of electricity annually. This demand may be reduced upon future installation of solar panels. Electricity demand generated by the proposed Project would increase electricity consumption by 0.3% over current City-wide demand. The Project would be required to meet even more stringent requirements than the current CalGreen building code, including the objectives set in the AB 32 Scoping Plan (CARB 2017), which would seek to make all newly constructed residential homes zero net energy (ZNE) consumers by 2020[1], and all new commercial buildings zero net energy (ZNE) consumers by 2030.[2]

[1] New Residential Zero Net Energy Action Plan 2015-2020 – Executive Summary by California Public Utilities Commission Energy Division and California Energy Commission Efficiency Division.

[2] Zero Net Energy - California Public Utilities Commission Energy Division; http://www.cpuc.ca.gov/ZNE/. Accessed February 2020.

Natural gas will be used during operation of the proposed Project. It is estimated that, at build out, additional natural gas consumption is expected to be 17,030 therms per year, and to increase City-wide use of natural gas by less than 0.2%. As is the case with electricity, adherence to existing and future building codes will assure the efficient use of natural gas, and continued improvements in technology, particularly related to appliances and HVAC equipment, will reduce long-term demand.

During operation, the Project would result in the consumption of petroleum-based fuels related to vehicular travel to and from the Project site. According to the Project traffic impact analysis, the Project is estimated to generate 562 daily vehicle trips under typical daily operations. Daily visitors will include a mix of employees, local residents, and out-of-town visitors. The Project could potentially generate 1,453,970 vehicle miles traveled (VMTs). Although the Project will result in a direct increase in VMTs, it will not interfere with increased fuel efficiency standards and will not result in wasteful, inefficient, or unnecessary consumption of transportation energy resources during operation.

The construction of the proposed Project will change the physical environment of the Project site. As discussed in Section 2.5, the proposed Project will not result in a significant loss of biological resources. The site is surrounded by development on three sides, and has 6.53± acres of undeveloped land. The Project will be required to pay mitigation fees to assure the off-site conservation of habitat lands for sensitive species covered by the Coachella Valley Multiple Species Habitat Conservation Plan. The Project site is not known to contain any threatened, endangered, or rare species, or sensitive natural communities not already covered under the Coachella Valley MSHCP. Therefore, although the proposed Project will result in the permanent loss of approximately 6.53 acres of vacant land, that loss will not be significant.

As discussed in Section 2.10, construction of the proposed Project will generate demand for water resources. The net Project water demand is projected to be 27.85 AFY, of which 15.62 AFY will be irrigation water. Part of the irrigation demand is currently met through the existing pond and recycled cooling tower water system. The Project design features desert and drought-tolerant plants for landscaping instead of turf, reducing the overall irrigation demand. Given the size and scope of the Project, the net annual demand for domestic water will be low, and impacts to the region's water supply will be less than significant.

In summary, although the proposed Project will result in the irreversible loss of finite resources, the loss will not be significant, and is consistent with or less than that expected for a project of similar scope consistent with the City's General Plan.

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6. GROWTH INDUCING IMPACTS

Section 15126.2 of the CEQA Guidelines requires that an EIR consider and analyze a project's potential to induce growth. Growth inducement can be directly generated by a project, such as the extension of a roadway into a previously undeveloped area, or may indirectly impact growth and cause changes in the environment that could lead to growth. This section is based on the project description provided in Section 1 of this EIR, and the analysis of the various impact areas conducted in Section 2.

Construction of the proposed Project is projected to occur over a four-year period and has the potential to attract workers and crew members to the area for a temporary construction opportunity. However, the four-year phased construction period would generate a limited demand for workers, many or most of which may be local to the area, and it is not expected to significantly increase the population. Operation of the Project will result in new jobs in the Betty Ford Center due to an increase in treatment capacity, which are likely to be filled by a combination of existing and new residents. As described in Section 2.14, the Rancho Mirage population increased 30% between 2000 and 2010, from 13,249 to 17,218 and the latest (2019) population estimate is 18,489. The Southern California Association of Governments projects the City's population will grow to 25,000 by 2040. The natural growth in population experienced in the City will result in a demand for jobs, a portion of which will be supplied by the proposed Project. Therefore, the proposed Project is not expected to induce population growth.

The proposed Project is located within the boundaries of the Eisenhower Medical Center. The proposed Preliminary Development Plan (PDP) Project provides important renovation of HBFC facilities, modestly increases its on-campus capabilities, and improves access to the HBFC campus. The surrounding lands are primarily developed, with some vacant lots designated as residential uses. All infrastructure is in place adjacent to the Project site, and no additional or larger infrastructure is required to implement the Project.

In conclusion, as described throughout this document, the Project will not result in growth inducing impacts that could cumulatively impact the environment. No new infrastructure, services or utilities, will be required for the proposed Project, and its impacts on the local population will be less than significant.

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7. ORGANIZATIONS, PERSONS AND DOCUMENTS CONSULTED

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B. Environmental/Planning Consultant

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42635 Melanie Place, Suite 101
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C. Air Quality Consultant

Terra Nova Planning & Research, Inc.
42635 Melanie Place, Suite 101
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D. Engineering Consultant/Noise and Traffic

Urban Crossroads
260 E. Baker St. Suite 200
Costa Mesa, CA 92626

E. Geotechnical Consultant

Earth Systems
79-811 Country Club Drive, Suite B
Bermuda Dunes, CA 92203

F. Historical/Archaeological

CRM TECH
1016 East Cooley Drive, Suite A/B
Colton, CA 92324

G. Hydrology

Michael Baker International
75-410 Gerald Ford Drive, Suite 100
Palm Desert, CA 92211

H. Utilities

Burrtec Waste Industries, Inc.
City of Rancho Mirage
Coachella Valley Water District
Southern California Edison
The Gas Company
Charter Spectrum, Frontier Communications, Hughes Net

I. Public Agencies

City of Rancho Mirage
California Office of Planning and Research
Coachella Valley Association of Governments
Coachella Valley Conservation Commission
Coachella Valley Mountains Conservancy
Coachella Valley Water District
Desert Sands Unified School District
South Coast Air Quality Management District
Southern California Edison
Regional Water Quality Control Board

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