CITY OF RANCHO MIRAGE

HAZELDEN BETTY FORD CENTER

MINOR MODIFICATION NO. 26-0001
TO
PDP19005

ADDENDUM TO ENVIRONMENTAL IMPACT REPORT

SCH No. 2019120372



Prepared for

City of Rancho Mirage
Planning Division
69-825 Highway 111
Rancho Mirage, CA 92270

Prepared by

Terra Nova Planning & Research, Inc.®
42635 Melanie Place, Suite 101
Palm Desert, CA 92211

February 2026

HAZELDEN BETTY FORD CENTER

MINOR MODIFICATION NO. 26-0001
TO
PDP19005

ADDENDUM TO ENVIRONMENTAL IMPACT REPORT
SCH No. 2019120372

Table of Contents

1.0 INTRODUCTION AND PROJECT DESCRIPTION 4

1.1 Introduction 4
1.2 Project Summary, Location and Limits 5
1.3 Purpose and Need 9
1.4 Project Background 9
1.5 Proposed Project: PDP Minor Mod No. 1 9
1.6 Rationale for EIR Addendum 17

2.0 ENVIRONMENTAL IMPACT ANALYSIS 18

2.1 Introduction 18
2.2 Summary of Environmental Impacts 19
2.3 Aesthetics 19
2.4 Air Quality 24
2.5 Biological Resources 31
2.6 Cultural and Tribal Cultural Resources 36
2.7 Geology and Soils 39
2.8 Greenhouse Gas Emissions 46
2.9 Hazards and Hazardous Materials 50
2.10 Hydrology and Water Quality 53
2.11 Land Use/Planning 56
2.12 Mineral and Energy Resources 59
2.13 Noise 63
2.14 Population, Housing and Socio-Economic Resources 66
2.15 Public Services 68
2.16 Transportation and Traffic 72
2.17 Utilities and Service Systems 76

List of Exhibits

Exhibit 1-1 Project Location Map 6
Exhibit 1-2 Project Vicinity 7
Exhibit 1-3 Project Planning Area 8
Exhibit 1-4 HBFF Approved Master Site Plan (2020) 10
Exhibit 1-5 HBFF Proposed PDP Minor Mod No. 1 Master Site Plan (2025) 11
Exhibit 1-6 HBFF Proposed PDP Minor Mod No. 1 Residence Hall Elevations 13
Exhibit 1-7 HBFF Proposed PDP Minor Mod No. 1 Dining Hall Elevations 14

List of Tables

Table 1-1 2020 Approved PDP Development Data 15
Table 1-2 Proposed PDP Minor Modification No. 1 Development Data 16

Table 2-1 CalEEMod Input Comparison Summary 2020 EIR v. PDP Minor Mod No. 1 29
Table 2-2 Construction Emissions Summary Comparison 2020 EIR v. PDP Minor Mod No. 1 30
Table 2-3 Operational Emissions Summary Comparison 2020 EIR v. PDP Minor Mod No. 1 31
Table 2-2 Localized Significance Thresholds 2020 EIR v. PDP Minor Mod No. 1 31
Table 2-5 Greenhouse Gas Emissions Summary 2020 EIR v. PDP Minor Mod No. 1 49

List of Appendices

Appendix A CalEEMod Model Run for PDP Minor Mod No. 1. December 2025 for the Hazeldon Betty Ford Center PDP Minor Modification No. 1 ..... A

Hazelden Betty Ford Center Preliminary Development Plan Minor Modification No. 1

Addendum to ENVIRONMENTAL IMPACT REPORT

1.0 INTRODUCTION AND PROJECT DESCRIPTION

1.1 Introduction

Lead Agency

The City of Rancho Mirage (City) is the Lead Agency responsible for the preparation of this Addendum to an 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. This EIR Addendum has also been prepared in conformance with Section 15164 of the CEQA Guidelines.

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 Addendum 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, Planning Manager, 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 (HBFF), 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, now Eisenhower Health) 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. With partial implementation of the City-approved Preliminary Development Plan (PDP19005) in 2020, access to the HBFC has also been secured along Vista Del Sol on the east Project boundary. The campus and facilities have continued to grow and services have been expanded. With the passage of time and changes in healthcare needs and services, 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 the master planning and new building effort.

Preliminary Development Plan Approval (2020)
In 2020, the City approved a Preliminary Development Plan (PDP19005) to complete the master planning of the HBFC campus. Approvals provided for development of a new 22,748± square foot Day Treatment Building, associated site improvements on the east end of the campus and along the Vista Del Sol frontage, and (2) two-story Residential Treatment Buildings totaling 61,870 square feet. The approved PDP also called for the demolition of the (4) existing one-story Residential Treatment Buildings on the HBFC campus. A total of 32,924 square feet of net new buildings was approved. Site improvements along the Vista Del Sol frontage were started in November of 2021 and completed in June of 2022.

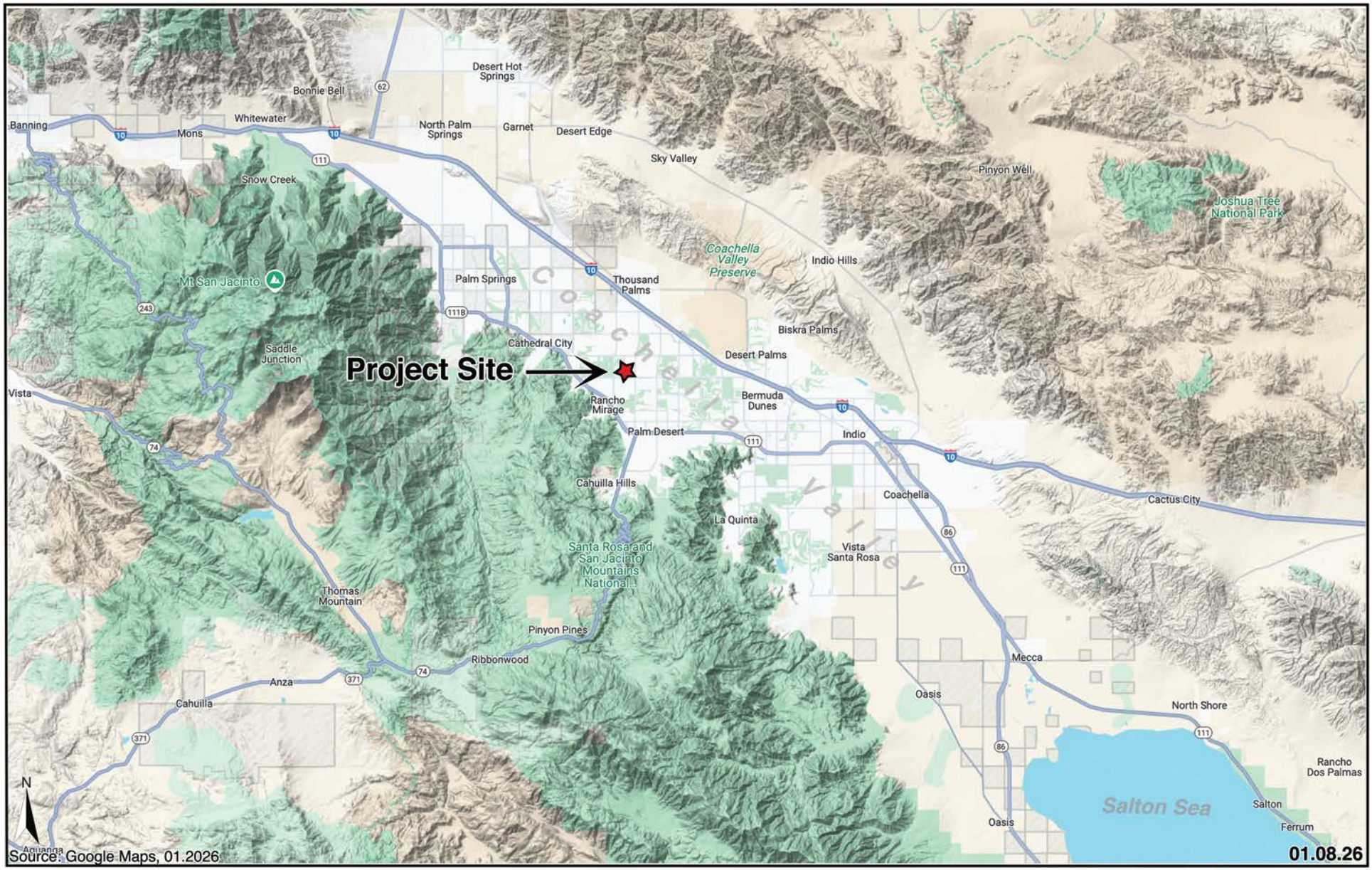
During this time, the HBFF continued planning the construction of the Day Treatment Building and the development of final designs for the (2) two-story Residential Treatment Buildings. In January of 2023, following an ongoing assessment of the development program and associated costs, HBFF decided to put further implementation of the approved PDP on hold. Since that time, HBFF has continued reviewing and assessing patient needs, further evaluating programmatic and physical needs, and considering alternatives to the approved PDP.

1.2 Project Summary, Location and Limits

Project Summary
HBFF proposes a Minor Modification No. 1 (Minor Modification No. 26-0001to the approved Project (PDP19005) in a manner that substantially reduces the extent of building demolition, a greater reliance on an expanded program of building renovation and a reduction in new construction. Specifically, HBFC PDP Minor Modification No. 1 would provide a new 29,980± square foot residential treatment building, a new 14,490± square foot dining hall, the renovation of the existing food service area into a 100-seat auditorium, and renovation of the four (4) existing one-story residential treatment buildings.

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. 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 EMC campus, which extends from Vista Del Sol on the east to Bob Hope Drive on the west. Portions of the EMC campus also extend south to Country Club Drive, including John Sinn Road from which the HBFC originally and currently continues to take secondary access (see Exhibit 1-3). The subject and surrounding lands are shown on the United States Geological Survey (USGS) 7.5-minute Cathedral City, California quadrangle.

The HBFC Campus is located in the eastern portion of the planning area and is defined by the Wilshire Palms residential condominium development to the south, vacant and developed EMC lands to the north and including the Barabara Sinatra Children's Center, and on the west by the main EMC Campus Also, please see Exhibit 1-1: Project Location Map, Exhibit 1-2: Project Vicinity and Exhibit 1-3: Project Planning Area. Assessor's Parcels involved in the subject PDP Minor Modification project include 685-270-017, 685-280-017, and 685-280-035.



TERRA NOVA®
PLANNING & RESEARCH, INC.

Project Location Map
Hazelden Betty Ford Center PDP Minor Modification No. 1
Rancho Mirage, California

Hazelden Betty Ford Foundation

Exhibit 1-1

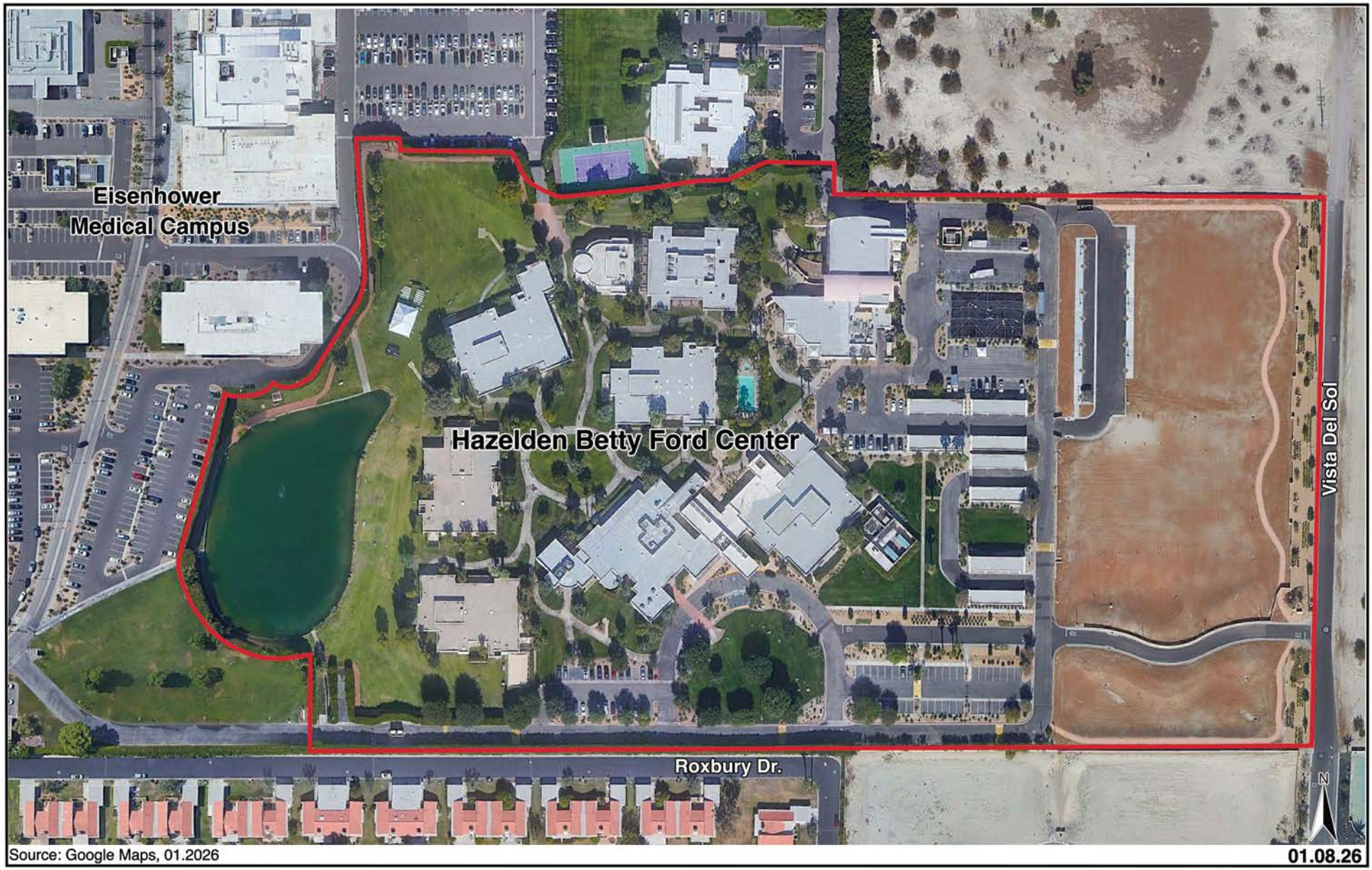


TERRA NOVA®
PLANNING & RESEARCH, INC.

Project Vicinity
Hazelden Betty Ford Center PDP Minor Modification No. 1
Rancho Mirage, California

Hazelden Betty Ford Foundation

Exhibit 1-2



Source: Google Maps, 01.2026

01.08.26

TERRA NOVA®
PLANNING & RESEARCH, INC.

Project Planning Area
Hazelden Betty Ford Center PDP Minor Modification No. 1
Rancho Mirage, California

Hazelden Betty Ford Foundation

Exhibit 1-3

1.3 Purpose and Need

The purpose of the proposed Project is to make revisions (minor modifications) to the development plan approved in 2020. Many of the campus improvements date from the early 1980s and over the years the needs of BFFC patients have changed, as have the scope and approach to treatment. Nonetheless, and consistent with the HBFF's original purpose, the proposed PDP Minor Mod No. 1 project renovates and modernizes the facilities and grounds of the existing HBFC campus and provides addition of on-campus resident beds, new dining facilities, and conversion of other non-residential facilities.

Since its inception in 1982, the HBFC has seen a continued growth in demand for quality treatment programs and facilities. The proposed PDP Minor Mod No. 1 Project will allow the HBFC to continue to update and modernize its residential and treatment facilities and expand its capabilities at the campus. The Project also provides new 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.

1.4 Project Background

Existing and Approved Development

The existing Hazelden Betty Ford Center (HBFC) is a 100-bed residential treatment facility, consisting of five residential buildings housing 20 beds each; in addition, five other buildings provide support services. The buildings currently on the campus have a combined area of 137,200± square feet. The 2020 approved Project (PDP19005) included the removal of four existing residential buildings totaling approximately 51,700 square feet which currently provide a total of 80 beds. These four buildings were to be replaced by two 2-story residential buildings with a maximum height of 31'-8", each providing 46 beds. Each new residential building would encompass 30,935 square feet for a total of 61,870 square feet.

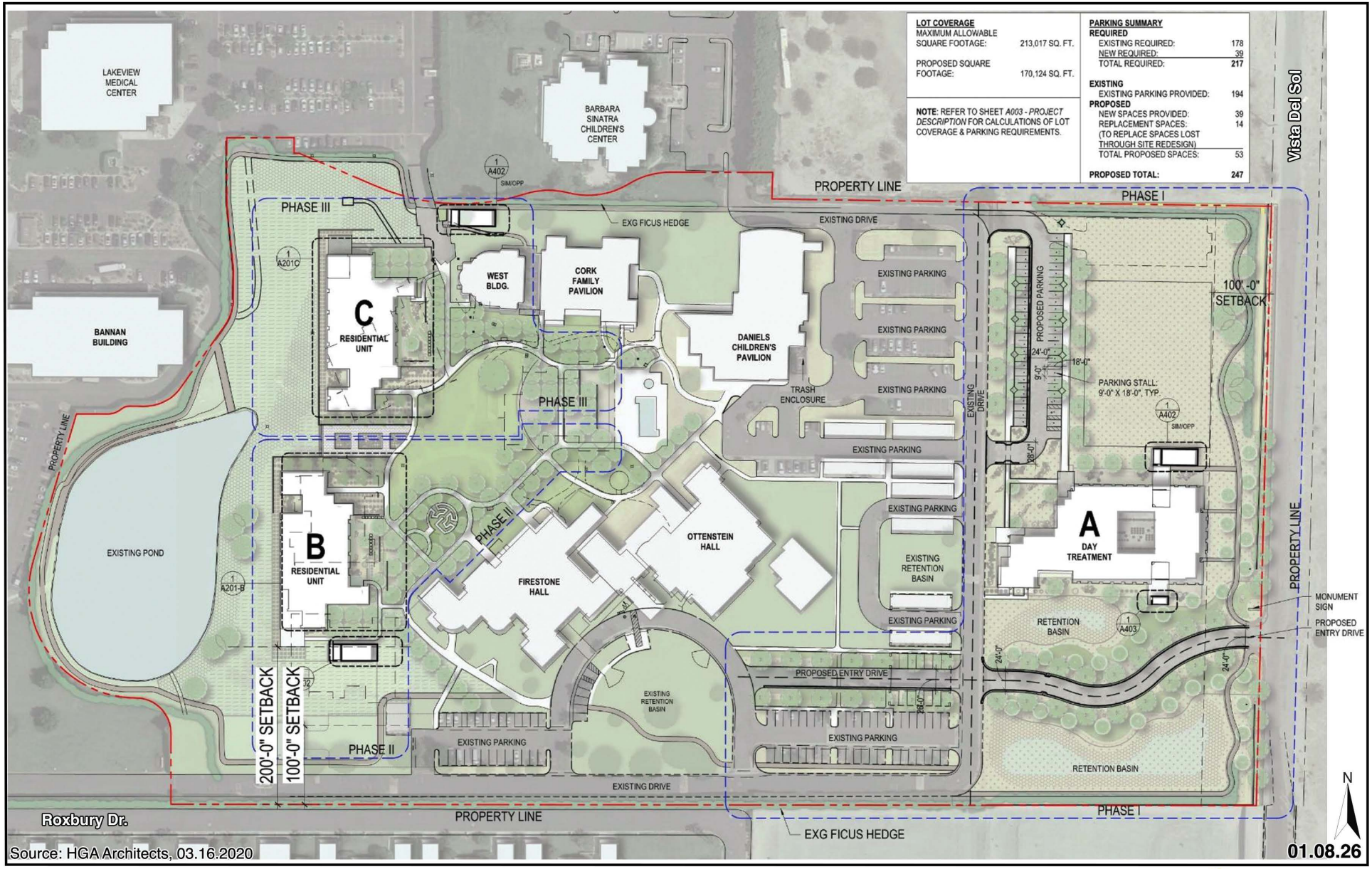
The approved Project also included the construction of a new one-story, 22,748 square foot day-treatment building to be located on the east portion of the campus. The new day treatment building was designed to accommodate 44-day treatment patients, and was to include associated support space, and 6,399 square feet of administrative space including a computer lab and lecture hall. The approved Project would yield a total of 156 beds, a net increase of 56 beds. In addition, it would increase the overall building area from 137,200± square feet to approximately 170,000± square feet. The master site plan with the 2020 approved PDP is shown on Exhibit 1-4.

1.5 Proposed Project: PDP Minor Mod No. 1

HBFF proposes to revise the approved Project (PDP19005) in a manner that substantially reduces the extent of building demolition and relies on an expanded program of building renovation and a reduction in new construction. Specifically, HBFC PDP Minor Modification No. 26-0001 would provide one new single-story residence hall/treatment building (Residence Hall) encompassing 29,980± square feet, providing 60 beds and extensive counseling and support facilities. Maximum building height would be 18.66 feet with architectural elements (top of mechanical screen) reaching 20.33 feet. Parking is provided for 24 vehicles south of the Residence Hall.

PDP Minor Mod No. 1 also includes construction of a new 14,490 square foot Dining Hall immediately east of the Daniels Children Pavilion and 50 feet south of the north property line. The new Dining Hall will provide full kitchen facilities, indoor and outdoor seating, a staff lounge, children's dining rooms and restroom facilities. An outdoor children's play area is also planned (see Exhibit 1-5). The new Dining Hall building would have a maximum height of 18 feet with most of this building at 14.33 feet. Restriped parking is planned immediately south of the proposed Dining Hall. A trash enclosure is planned at the building's northwest corner, approximately 60 feet south of the north property line and provided with a 20±-foot landscape buffer and masonry boundary wall.

The revised Project would also involve the conversion of a 5,720 square foot portion of the existing Daniels Children's Pavilion from its existing food service function into a 100±-seat auditorium.



Source: HGA Architects, 03.16.2020

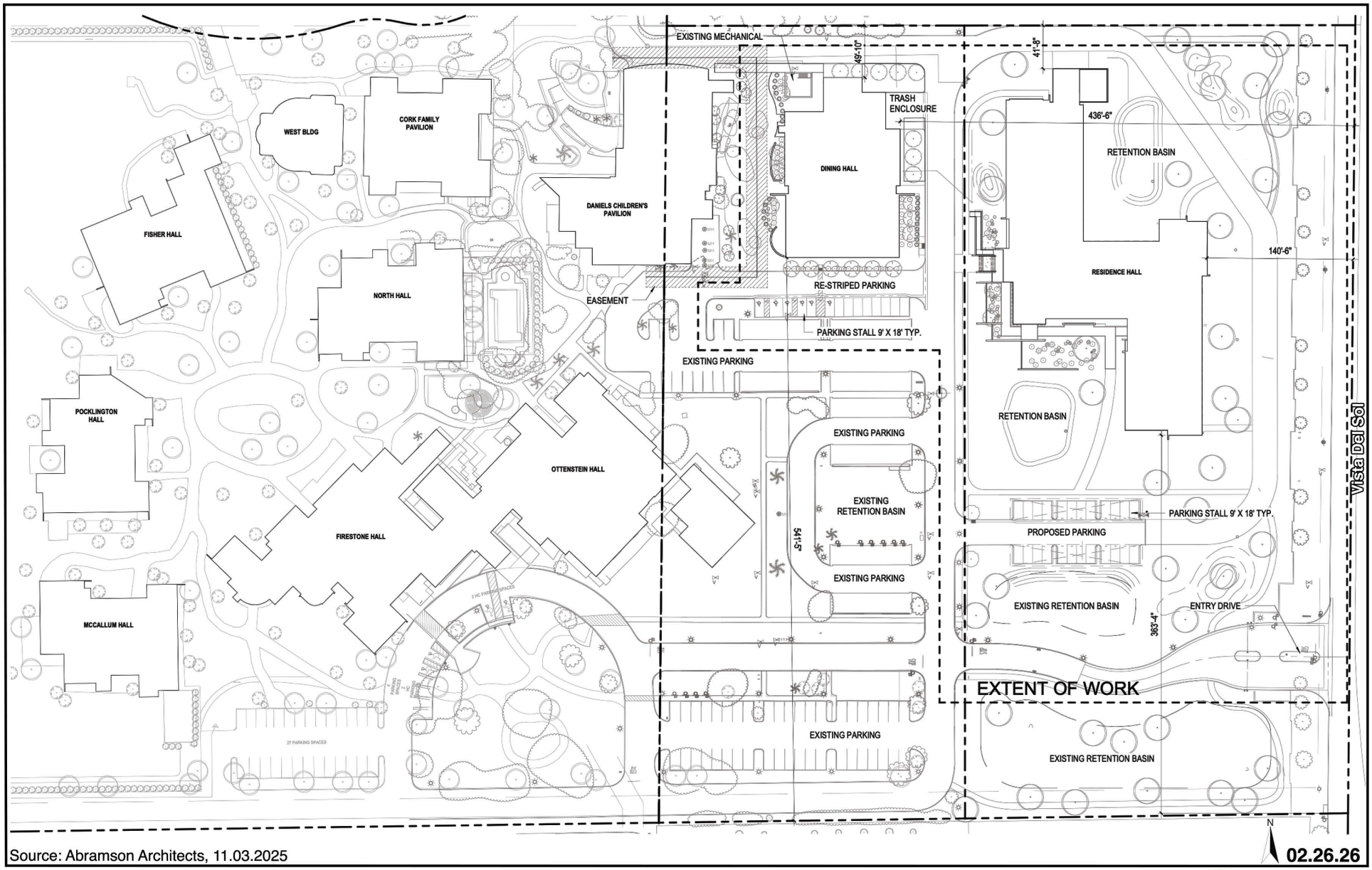
01.08.26

HBFF Approved Master Site Plan (2020)
Hazelden Betty Ford Center PDP Minor Modification No. 1
Rancho Mirage, California

TERRA NOVA®
PLANNING & RESEARCH, INC.

Hazelden Betty Ford Foundation

Exhibit 1-4



Source: Abramson Architects, 11.03.2025

02.26.26

TERRA NOVA®
PLANNING & RESEARCH, INC.

HBFF Proposed Minor Modification No. 1 Master Site Plan (2025)
Hazelden Betty Ford Center PDP Minor Modification No. 1
Rancho Mirage, California

Hazelden Betty Ford Foundation

Exhibit 1-5

As noted, and as a departure from current entitlements, HBFF proposes that the two new buildings to be developed will be one-story. The previously approved day treatment building would be replaced by the 60-bed Residence Hall building, which will be located in the northeast corner of the Project site north of the previously approved day treatment building site.

The Residence Hall would be set back 140.5±-feet from the Vista Del Sol right of way, 41.66± feet from the north property line, and 363.3 feet north of the south property line. Four existing residential buildings originally planned for demolition would be preserved and refurbished. The PDP Minor Mod No. 26-0001 project would result in four (4) additional beds for a total of 160 beds, compared to the 156 beds approved in 2020. The total square footage of construction would be increased by 11,024± square feet comprised mostly of Dining Hall space. The types and intensities of land use are essentially the same as for the approved 2020 project.

Vista Del Sol Access Drive

Pursuant to the current PDP approved in 2020, a new primary access onto the HBFC campus from the adjoining Vista Del Sol has been constructed, along with an associated stormwater retention basin in the southeast corner of the site. Bounding the subject property on the east, Vista Del Sol extends south to a signalized intersection at Country Club Drive, and north to a stop-controlled intersection at Frank Sinatra Drive. The proposed modifications to the access drive would vary the paved width between 24 to 30 feet, proceeding west into the campus from Vista Del Sol and connecting to the existing on-site circulation network. A staggered decorative masonry wall and parkway landscaping have also been installed along the widened Vista Del Sol right of way, and power lines have been placed underground pursuant to the 2020 PDP approval. The applicant also wishes to install an entry gate with a landscaped call box island and turn around lane on its access drive on Vista Del Sol.

Ancillary Site Modifications

In addition to completed Vista Del Sol, driveway and retention basin improvements made pursuant to the 2020-approved PDP, grading of the easternmost portion of the Project site has also been accomplished. Ancillary parking has also been built in this portion of the site (see Exhibit 1-5). Both the proposed and previously approved plans update gardens and open space areas, with an increased emphasis on desert and drought-tolerant landscaping.

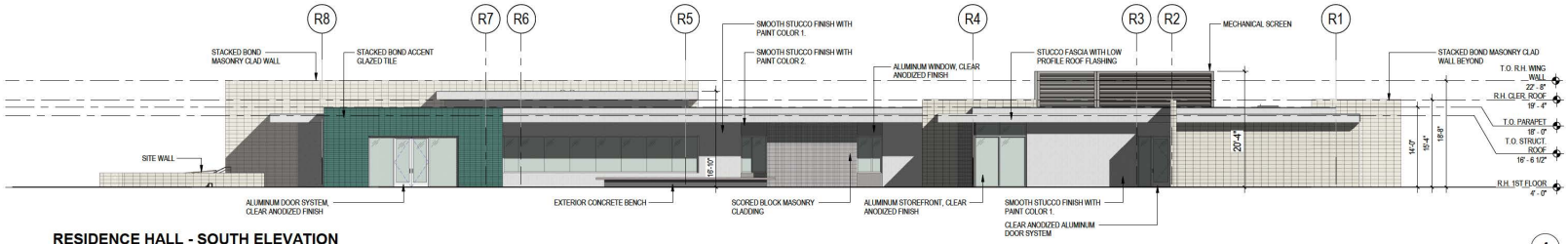
Parking

As part of the revised project, the applicant has conducted an onsite field verification of current HBFF campus parking in May of 2025 and identified 264 existing parking spaces on the HBFF campus, including an additional 53 spaces built pursuant to PDP19005. Those 53 new parking spaces now exist in the area that will be used for the new Residence Hall (RH-1) under this Minor Modification, will be demolished as part of this project.

The Minor Mod No 1 project also locates the new Dining Hall (DN-1) at the north end of the existing parking lot to the east of the Daniels Building. This will result in the demolition of an additional 56 parking spaces, for a total demolition of 109 existing parking spaces as part of this modification.

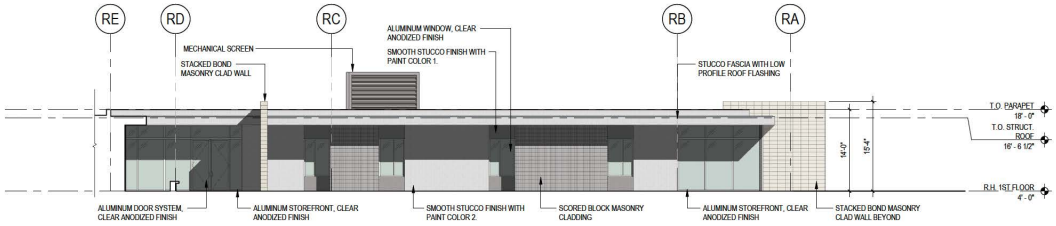
The Residence Hall will require 0.2 parking spaces per bed (1 per 5 beds) resulting in a parking requirement of 12 parking spaces for this building (60 beds x .2 parking spaces/bed). The new Dining Hall will replace existing dining facilities and is an accessory use that will house all Food Services for the HBFF campus, so no additional parking requirements would be generated from that use under the SPA parking requirements. However, with the completion of the new Dining Hall, the existing Food Service program will be relocated from its current location in the Daniels Building to the new facility, and the vacated space will be renovated for use as an auditorium to accommodate 100 seats. Applicable SPA parking requirements for the auditorium use are tabulated at a required rate of 0.2 parking spaces per seat resulting in a parking requirement of 20 parking spaces for this building.

It should be noted that parking is no longer a required area of CEQA analysis. Nonetheless, the parking information illustrates how the applicant addresses changing parking needs and location of parking facilities associated with proposed Minor Mod No. 1.



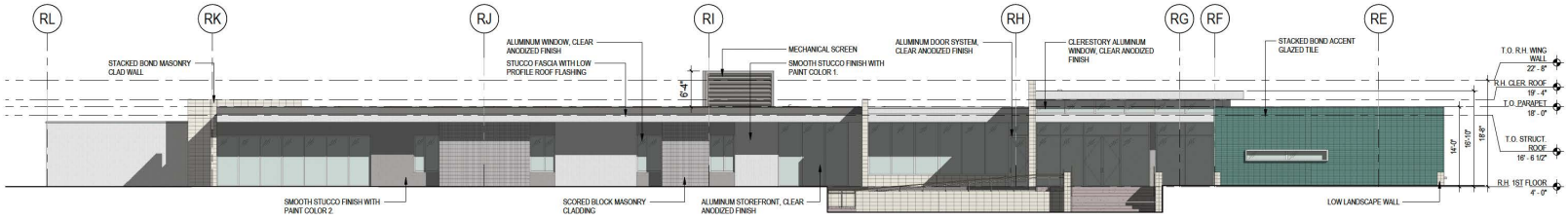
RESIDENCE HALL - SOUTH ELEVATION 4

SCALE: 1" = 10'-0"



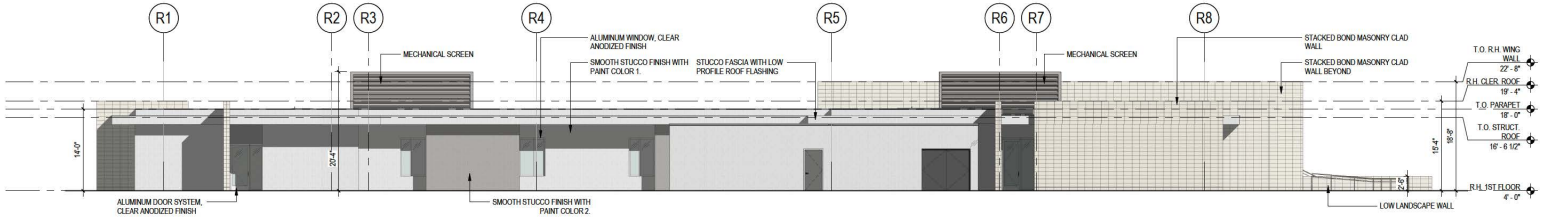
RESIDENCE HALL - WEST ELEVATION SOUTH 3

SCALE: 1" = 10'-0"



RESIDENCE HALL - WEST ELEVATION NORTH 2

SCALE: 1" = 10'-0"



RESIDENCE HALL - NORTH ELEVATION 1

SCALE: 1" = 10'-0"

Source: Abramson Architects, 11.04.2025

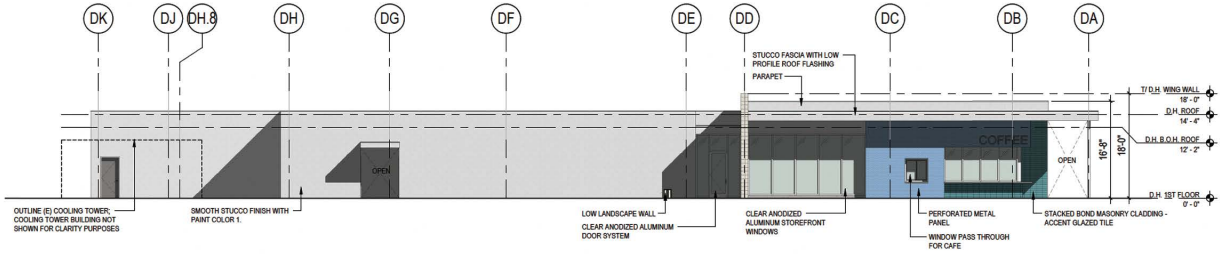
01.08.26

Exhibit 1-6

TERRA NOVA®
PLANNING & RESEARCH, INC.

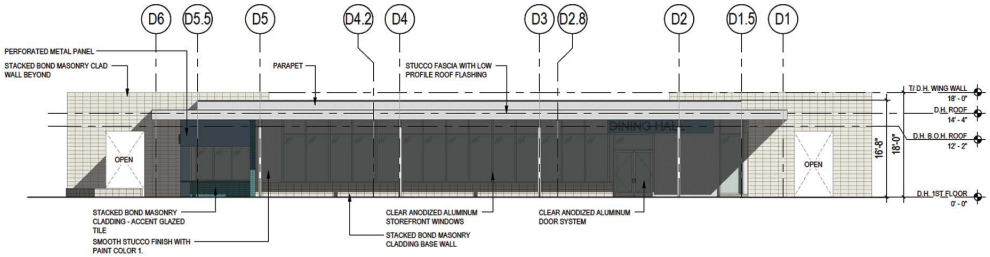
HBFF Proposed Minor Modification No. 1 Residence Hall Elevations
Hazelden Betty Ford Center PDP Minor Modification No. 1
Rancho Mirage, California

Hazelden Betty Ford Foundation



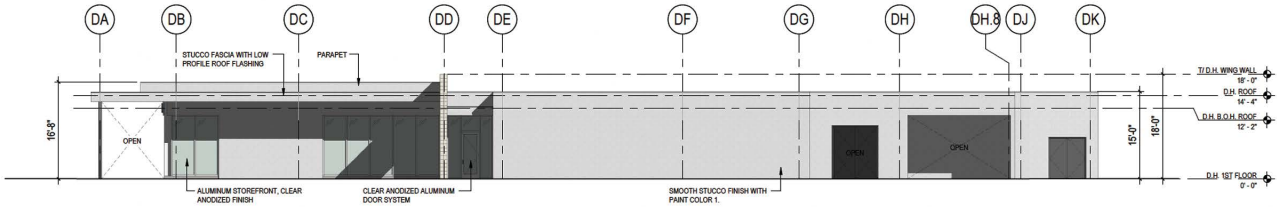
DINING HALL - WEST ELEVATION (4)

SCALE: 1" = 10'-0"



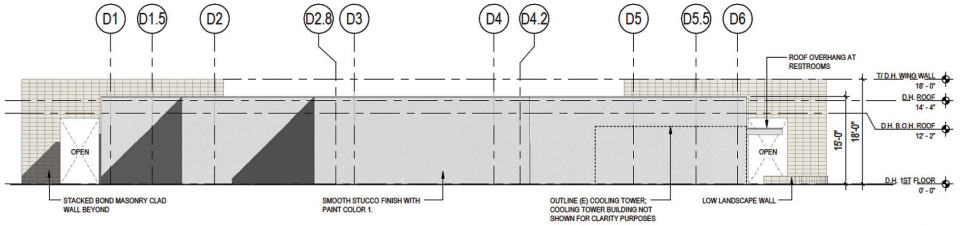
DINING HALL - SOUTH ELEVATION (3)

SCALE: 1" = 10'-0"



DINING HALL - EAST ELEVATION (2)

SCALE: 1" = 10'-0"



DINING HALL - NORTH ELEVATION (1)

SCALE: 1" = 10'-0"

01.08.26

TERRA NOVA®
PLANNING & RESEARCH, INC.

HBFF Proposed Minor Modification No. 1 Dining Hall Elevations
Hazelden Betty Ford Center PDP Minor Modification No. 1
Rancho Mirage, California

Hazelden Betty Ford Foundation

Exhibit 1-7

Table 1-1: 2020 Approved PDP Development Data

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**

Table 1-2: Proposed PDP Minor Modification No. 1 Development Data

Building Name	Existing No. of Beds	Proposed No. of Beds	Sq. Ft. Existing	Proposed Sq. Ft.	(+/-)	Functional Use	Parking Rate	Existing Prkg. Provided	New Prkg. Spaces Rqrd.	Notes
Fisher Hall	20	20	12,818	12,818		Special Treatment	0.2 / Bed	4	0	Existing Building to Remain
Pocklington Hall	20	20	12,894	12,894		Special Treatment	0.2 / Bed	4	0	Existing Building to Remain
McCallum Hall	20	20	12,988	12,988		Special Treatment	0.2 / Bed	4	0	Existing Building to Remain
North Hall	20	20	12,994	12,994		Special Treatment	0.2 / Bed	4	0	Existing Building to Remain
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	-					100 seats	0.2 / seat	20	0	Conversion of 5,720 SF to Auditorium
Office Spaces			25,606	25,606-	-	General Office	4.0 / 1000 SF	56	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**~~	~~-~~
Residence Bldg.		**60**		**29,980**	**29,980**			**12**	**0**	**New Building**
Dining Hall				**14,490**	**14,490**	**Dining**	**N.A.**		**0**	**New Building (Accessory Use)**
~~- Functions~~				~~**17,103**~~	~~**17,103**~~	~~**Special Treatment**~~	~~**0.2 / Bed**~~		~~**9**~~	
Totals	**100**	**160**	**137,200**	**181,670**	**44,470**			**179**	**0**	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
									218	**Total Number of Parking Spaces Provided**

1.6 Rationale for EIR Addendum

Pursuant to CEQA Sections 15162 and 15163, when an EIR has been certified for a project, no subsequent EIR is required unless (1) substantial changes are proposed in the project which will require major revisions of the previous EIR due to anticipated new significant environmental effects, (2) substantial changes in circumstances have occurred and new significant environmental effects could occur; or (3) new information of substantial importance that was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete.

As evidenced in this EIR Addendum, the proposed Minor Mod No. 1 will not generate any new or significantly intensified environmental effects that were not analysed in the 2020 EIR. In addition to not introducing new effects, the proposed Project is expected to substantially reduce effects in several categories of analysis including aesthetic resources, air quality, GHG emissions and other areas of analysis evaluated in the 2020 EIR. There have been no substantial changes in circumstances at or in the vicinity of the Project site; rather roadway and parkway improvements and undergrounded utilities associated with implementation of the 2020 EIR have improved project area circumstances. No new information of substantial or even minor importance has arisen over the course of conducting this Addendum analysis. In summary, the proposed Minor Modification No. 1 does not introduce new significant environmental effects, is planned under essentially the same circumstances that prevailed when the 2020 EIR was prepared and certified with no new information of importance having emerged.

Hazelden Betty Ford Center Preliminary Development Plan Minor Modification No. 1

Addendum to ENVIRONMENTAL IMPACT REPORT

2.0 ENVIRONMENTAL IMPACT ANALYSIS

2.1 Introduction

In accordance with CEQA Guidelines Section 15164, a Lead Agency is required to prepare an EIR Addendum to a previously certified EIR if some changes or additions to a project are necessary, but the proposed project modifications do not require preparation of a subsequent EIR, as provided in Guidelines Section 15162. In addition, the proposed modifications cannot result in new or substantially more significant environmental impacts compared with the impacts disclosed in the previously certified 2020 EIR. CEQA Guidelines Section 15162 states that a subsequent EIR would be required for a project if any of the following conditions exist:

1. Substantial changes to the project require major revisions to the previously certified EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified effects.

2. Substantial changes occur with respect to the circumstances under which the project is undertaken that require major revisions to the previously certified EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified effects; or

3. The availability of new information of substantial importance, which was not known or could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified, shows that the project will have one or more significant effects not discussed in the previous EIR, significant effects previously examined will be substantially more severe than shown in the previous EIR, or mitigation measures or alternatives that were previously found not to be feasible or that are considerably different from those analyzed in the previously certified EIR would substantially reduce one or more significant effects on the environment, but the project proponent declines to adopt the mitigation measure or alternative.

The analysis is divided into three parts. First, the analysis, findings and mitigation measures provided in the 2020 EIR are summarized. Then the Build Out Conditions shown in Table 1-1: "Approved PDP Development Data," is compared to the 2020 EIR's findings, to determine whether any substantial change in conditions or impacts have occurred on the subject lands. Finally, an analysis of the proposed PDP Minor Mod No. 1 Project (Table 1-2) is conducted to establish its specific impacts, its consistency with the certified 2020 EIR, and provide any Project-specific mitigation measures necessary to reduce impacts to less than significant levels.

Based on the evaluation of information provided in this EIR Addendum, no new significant impacts would occur as a result of the proposed PDP Minor Mod No. 1 Project, nor would there be any substantial increase in the severity of any previously identified adverse environmental impacts. Therefore, none of the conditions described in Section 15162 of the CEQA Guidelines has occurred. For this reason, and as discussed categorically below, an EIR addendum is the appropriate document to comply with CEQA requirements for the proposed Project.

2.2 Summary of Environmental Impacts

The HBFC Certified EIR is referenced as the "2020 EIR" below. In accordance with CEQA Guidelines §15162, the following analysis addresses each of the environmental issues analyzed in the approved 2020 EIR as compared to the potential changes in environmental impacts due to the proposed PDP Minor Mod No. 1 Project. Where analysis of Project buildout is critical and quantifiable, a comparison of the 2020 EIR and current (2025) land use calculations has been provided.

The analysis is divided into three parts. First, the analysis, findings and mitigation measures provided in the 2020 EIR are summarized. Then the proposed Project Build Out Conditions shown in Table 1-2: Proposed PDP Minor Mod No. 1 Development Data is compared to the 2020 EIR's findings, to determine whether any substantial change in conditions or impacts has occurred on the subject lands. Finally, an analysis of the proposed PDP Minor Mod No. 1 Project is conducted to establish its Project-specific impacts, its consistency with the 2020 EIR, and provide any Project-specific mitigation measures necessary to reduce impacts to less than significant levels.

2.3 Aesthetics

2.3.1: 2020 EIR: Summary of Findings (Section 2.3, page 2.3-1 et. seq.)

Background

The 2020 EIR evaluated the aesthetic resources of the Project site and surrounding lands. The subject lands are located on rolling stabilized sand dunes on the valley floor, 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 EMC campus, master planned residential communities (Rancho Mirage Country Club and Wilshire Palms), 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. In 2020, major portions of Vista Del Sol were partially paved and in disrepair. The visual resources along Vista Del Sol were characterized by this partially graded and constructed roadway and some dumping of largely construction wastes. Mountain views were visible along three of the four compass points, with views of the Santa Rosa Mountains to the south being the most prominent. There were no streetlights along Vista Del Sol although security lighting at nearby homes was evident.

2020 EIR Impact Findings: Aesthetics

2020 EIR: *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?

Impacts to Visual Character, Scenic Vistas and Resources

The 2020 EIR evaluated the removal of four existing one-story residential inpatient buildings located on the western portion of the HBFC campus to be replaced with two two-story residential inpatient buildings in the same campus location and oriented north-south. These two new buildings were planned 250± feet north of the HBFC south property line, and 860± feet south of the nearest home within the Rancho Mirage Country Club development. These buildings would not exceed 30 feet in overall height.

Also evaluated in the 2020 EIR was a one-story day-treatment building to be built approximately 100± feet west of Vista Del Sol and 290± feet north of the south property line. This building was to be oriented east-west with an upward and westward sweep to the roof. The east end of this building ranged from 13 to 20 feet above finished grad, while the west end was planned with a maximum height of 25.4± feet. An entry drive and landscaped and fully improved roadway half-width of Vista Del Sol was also planned; this portion of the Project has been constructed.

Th 2020 EIR analyzed the potential impacts of the proposed Project on the surrounding scenic vistas. The development site and improvements were analyzed using 3D computer modeling that evaluated the Project's effects on six viewsheds. The 2020 EIR concluded that the PDP Project would have a limited and less than significant impact on existing viewsheds as seen from surrounding residential properties and from public rights-of-way.

2020 EIR: *d) Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?*

Impacts From Light and Glare

The 2020 EIR evaluated the potential for the project to create substantial light and glare, including from streetlights, parking lot lighting, architectural lighting, security lighting, illuminated signage, and the reflection of light off of cars and other reflective surfaces. The light environment on the HBFC campus was determined to be comparable to or lower than that on the adjoining EMC campus. Limited increased lighting levels were planned along the adjoining Vista Del Sol on the east. A photometric analysis[1] 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 within the 0.0 to 5 foot-candle range. The approved and proposed Projects are required to generate 0.00 (zero) foot-candles of nighttime illumination at the subject property boundaries.

Parking lot and on-building security lighting would meet minimum levels for safety and security but would be limited in extent and planned intensity. Upgrading and additional pedestrian-level lighting throughout the site was also evaluated. The potential for reflective glare from building facades appeared 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 evaluated in the 2020 EIR included low lighting levels and lighting that protects the night sky. Detailed project lighting plans were to be prepared that controls the type, size and location of a full range of lighting fixtures and levels. Mitigation measures set forth below were included the 2020 EIR to ensure the use of the lowest levels of lighting practicable to provide adequate illumination, visibility and safety.

[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.

2020 EIR: Summary of Impacts

The Project 2020 EIR concluded that with mitigation set forth in the EIR the Project would not create any significant, unmitigated impacts to aesthetic resources, including scenic vistas and other scenic resources, would not affect a designated scenic highway, or geographic points of interest. The 2020 report also concluded that the Project would not substantially degrade the existing visual character or quality of public views of the site and its surroundings, nor would it create new substantial sources of light or glare.

2020 EIR: Mitigation Measures

The 2020 PDP Project addressed issues of visual and scenic resource impacts through quality 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".

2020 EIR: Avoidance/Minimization by Design

The HBFC PDP Project design incorporated a variety of design features to limit the effects of the Project on the area's viewsheds. Project design details addressed building architecture, materials, colors and textures, and related features and incorporated principles to mitigate some of the potential adverse effects of existing conditions and future development. It also included design elements to visually enhance the campus and its Vista Del Sol frontage. The 2020 Project also called for a plant palette of native desert and other appropriate drought tolerant vegetation.

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. Proper light fixture selection, siting and installation, and considerations for shielding ensure impacts from light and glare are less than significant.

2020 EIR: Additional Mitigation Measures

While the overall impacts to visual resources of the 2020 PDP Project on the planning area appear to be less than significant, the following additional mitigation measures were also incorporated into the 2020 EIR 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.

2.3.2: Comparison of 2020 EIR vs 2026 PDP Minor Mod No. 1 Project

The proposed PDP Minor Mod No. 1 Project results in a substantial reduction in new site development, preserving residential buildings planned for replacement in the original PDP and limiting new construction to a new residence hall/treatment building (Residence Hall) and a new Dining Hall. Interior renovations and updating are planned for the existing on-site residences and Daniels Children's Center, to the east of which is the new site of the proposed dining hall. The new Dining Hall would have a maximum height of 18 feet and would be located approximately 50± feet south of the north property line shared with a currently undeveloped EMC parcel, which is and will remain buffered by perimeter landscaping and six-foot masonry boundary wall.

The original "Day Treatment" building was planned in 2020 for a location in the south half of the easterly most portion of the site. Minor Mod Project No. 1 would combine residence and treatment facilities into the now proposed Residence Hall that would be built in the north half of the easterly portion of the site (see Exhibit 1-5). The 2020-approved day treatment building was designed with a maximum height of 26.5 feet. The new Residence Hall would be limited to one story and 18.66 feet in height, with the top of the mechanical screen reaching 20.33 feet and would be set back a minimum of 41.66± feet from the north property line and 140.5± feet from the Vista Del Sol right of way.

The proposed PDP Minor Mod No. 1 Project would also modify portions of the existing parking lot south of the proposed Dining Hall and west of proposed Residence Hall. A new parking lot would be constructed south of the proposed residence hall and north of the new access drive from Vista del Sol and a landscaped retention basin. Lighting associated with the proposed Dining Hall and Residence Hall, and with the new and reconfigured parking areas, is designed to minimize lighting levels while providing safety and security.

2.3.3: Analysis of Proposed Minor Mod No. 1 Project

The proposed PDP Minor Mod No. 1 Project would result in a substantial reduction in site disturbance and new development, when compared to the approved project. Four existing resident buildings were originally planned for demolition and replacement with two 2-story multi-resident buildings. Under the proposed Minor Mod No. 1, these four residential buildings would remain and would receive internal renovations only. Therefore, impacts associated with the construction of two new residential buildings would not occur if the proposed PDP Minor Mod No. 1 Project is implemented.

The new Residence Hall would replace the approved Day Treatment Center building, which would be set back 140.5 feet from Vista del Sol, where the applicant has already constructed half-width improvements to this public road, and constructed a six-foot decorative masonry wall and parkway landscaping. The new access drive approved in 2020 has also been constructed. A portion of planned additional parking in the north half of the east portion of the site has also been constructed but would be eliminated and new parking would be built immediately south of the proposed Residence Hall.

The proposed Minor Mod No. 1 project would also increase the distance between planned development and the nearest residences to the north (Rancho Mirage Country Club) and the south (Wilshire Palms condominiums). The proposed Dining Hall would be 1,020± feet southeast of the nearest home in Rancho Mirage Country Club and 700± feet from the nearest home at Wilshire Palms. The proposed Residence Hall would bring new development farther north on the site with this one-story building well beyond the mandated 100-foot setback from Vista del Sol.

Visual Character/Scenic Resources

Several viewshed simulations were prepared for the 2020 application which remain informative in evaluating the effects of the proposed PDP Minor Mod No. 1 project. The visual character along Vista del Sol has been altered in conformance with the approved 2020 project and has significantly enhance the appearance of the subject property and the streetscape.

Light and Glare

The proposed PDP Minor Mod No. 1 would result in a net reduction in on-site lighting that could generate a significant level of light and glare that could affect surrounding properties and public roads. Previously considered sources of light and glare included 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 remains 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.

In 2020, a photometric analysis[3] was conducted along the boundary of the developed portion of the HBFC campus with light levels measured in foot-candles[4], which generally shows very low lighting levels along the campus boundary ranging from 0.0 to about 3 foot-candles. The results of this photometric analysis continue to be valid, the only exception being eight (8) parking area fixtures in the proposed "East Garden" portion of the site next to the new Residence Hall proposed in PDP Minor Mod No. 1.[5] Campus locations where levels of illumination are higher are associated with elevated light poles adjacent to parking and security areas, with existing lighting levels that range from 0.1 to 46.4 foot-candles. The vast majority of campus boundary illumination continues to fall in within the 0.0 to 5 foot-candle range.

The light plan indicates that approximately six (6) new light standards will be required to adequately illuminate this new parking lot, which will replace the existing parking and lighting located in the future East Garden. Service area and on-building security lighting will be installed in association with the proposed Dining Hall structure planned immediately east of the existing Daniels Children Pavilion. Landscape and outdoor dining area lighting is also planned and will be low wattage and low profile, making a de minimis contribution to site lighting and off-site effects. Pathways will be illuminated with shielded bollard fixtures. Proposed 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 low profile/low intensity pedestrian-level lighting is also planned throughout the site. The potential for reflective glare from building facades appears to be limited and less than significant.

---

3 "Existing Site Lighting Photometric Plan" prepared by RTM Engineering Consultants. January 2020.

4 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.

5 Updated Site Photometrics, Minor Modification No. 1 application Sheet LT.02 of plan set. November 14, 2025.

The HBFC campus PDP Minor Mod No. 1 plans include low lighting levels and lighting that protects the night sky as criteria for determining appropriate lighting levels. A new and updated detailed project lighting plan has been prepared that controls the type, size and location of a full range of lighting fixtures and levels. The photometric analysis prepared for the revised Project[6] indicates lighting levels at the property line ranging from 0.00 to 0.2. Mitigation measures set forth above and in the 2020 Project EIR continue to apply and ensure the use of the lowest levels of lighting practicable to provide adequate illumination, visibility and safety.

2.4 Air Quality

2.4.1 2020 EIR: Summary of Findings (Section 2.4, page 2.4-1 et. seq.)

Background
The Project is located within the Coachella Valley portion of the Salton Sea Air Basin (SSAB) under the jurisdiction of the South Coast Air Quality Management District (SCAQMD). The Project area is located 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."[7] As discussed in Sections 2.4.3 and 2.4.4 of the 2020 EIR, 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 excepting parking. Spaces in the northwest corner of this part of the site; the balance of this area is sparsely vegetated and characterized by fine sandy soils.

As was the case in 2020, most of the land in the vicinity of the Project site is developed with medical and residential land uses. Lands in the broader project area are 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. 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.

2020 EIR: *a) Conflict with or obstructs implementation of the applicable air quality plan?*

Impacts on Air Quality Plans
At the time the 2020 EIR was drafted, the Project was subject to the 2016 Air Quality Management Plan (AQMP) and the 2003 Coachella Valley PM10 State Implementation Plan (SIP). SCAQMD works directly with the Southern California Association of Governments (SCAG), who at the time had adopted the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (2016 RTP/SCS). The Growth Management chapter of the RTP/SCS forms the basis of land use and transportation controls of the AQMP. Therefore, the AQMP is based, in part, on the land use plans of the jurisdictions in the region.

The 2020 EIR determined that the Project was consistent with the City's land use designations and, therefore, with the growth assumptions underlying the 2016 AQMP. Furthermore, the Project would incorporate all applicable measures from relevant air quality management plans to reduce air quality impacts to the greatest extent feasible. The 2020 EIR concluded that the Project would not conflict with or obstruct implementation of the applicable air quality plans, and determined there would be "no impact."

6 Ibid.
7 Exhibit 25: Wind Erosion Hazard, Rancho Mirage 2017 General Plan.

2020 EIR: *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?*

Impacts from Criteria Pollutant Emissions
The California Emissions Estimator Model (CalEEMod), version 2016.3.2, was used in the 2020 EIR to estimate potential criteria pollutant emissions associated with the Project.

Construction
The 2020 EIR analyzed emissions from construction activities including building demolition and hauling, site excavation and grading, materials import, construction worker travel, etc. The 2020 EIR Project construction data are listed below and were applied to the CalEEMod software:

- 2.5-year buildout
- Building demolition: 51,694 square feet
- Asphalt/concrete removal: 142 cubic yards
- Grading material net export: 5,085 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 22,748 square feet of new day treatment facilities (total of 156 beds and 120,457 square feet of treatment/office/ amenities when combined with existing uses)
- New asphalt and concrete, including both on-site and improvements along Vista Del Sol: 87,129 square feet.

The following table from the 2020 EIR describes pollutant emissions during construction of the Project. Data represent maximum daily emissions expected over the 2.5-year buildout period.

2020 EIR Table 2.4-5
Construction Emissions Summary
(lbs./day)

	CO	**NO_x**	**ROG**	**SO_x**	**PM_{10}**	**$PM_{2.5}$**
2020 EIR	91	25	42	0	4	2
SCAQMD Threshold	**550**	**100**	**75**	**150**	**150**	**55**
Exceeds Threshold	**No**	**No**	**No**	**No**	**No**	**No**

Source: 2020 EIR Table 2.4-5, p. 2.4-9.
CalEEMod Version 2016.3.2. See Appendix B of 2020 EIR for detailed tables. Value shown represents the average emissions of summer and winter outputs (rounded numbers).

As shown in the table from the 2020 EIR above, SCAQMD daily thresholds for CO, NO_x, ROG, SOx, PM_{10} and $PM_{2.5}$ were not exceeded for the Project, and impacts were determined to be "less than significant."

Operation
The 2020 EIR analyzed operational emissions generated by area sources (pavement off-gassing, building maintenance and cleaning supplies etc.), energy (direct and indirect use of fossil fuels for energy), and mobile sources (motor vehicle trip emissions). The 2020 EIR calculated the net change in operational emissions by comparing existing operations (operations) to proposed operations. The following assumptions were made in CalEEMod in the 2020 EIR:

- 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[8] and the 10th Edition ITE "Trip Generation" handbook[9]. 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 from the 2020 EIR identified the operational criteria pollutant emissions of the existing HBFC versus the full campus operations under the 2020 Project. As shown in the table, 2020 Project-generated operational emissions would not exceed SCAQMD thresholds for any criteria pollutant, and impacts were determined to be "less than significant."

2020 EIR Table 2.4-6
Operational Emissions Summary
(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: 2020 EIR Table 2.4-6, p. 2.4-10.
CalEEMod Version 2016.3.2. See Appendix B of 2020 EIR for detailed tables. Value shown represents the average emissions of summer and winter outputs.
* Inclusive of all buildings and operations post-Project construction.
** In 2020, the SCAQMD operational air quality significance thresholds for the Coachella Valley were the same as SCAQMD construction air quality significance thresholds.

Health Impacts

The 2020 EIR concluded that potential health impacts from Project construction and operation would be "less than significant" due to the relatively low level of Project emissions, its location away from major roadways (avoiding concentrated vehicle emissions), and required emission control measures.

Cumulative Impacts

The Project is located in a region designated as nonattainment for PM10 and ozone (precursors of which include CO, NOx, and ROG). The 2020 EIR determined that the Project's emissions would result in an incremental but not cumulatively considerable contribution to regional PM10 or ozone levels because projected emissions fell below SCAQMD significance thresholds. Impacts would be further reduced through implementation of a dust control plan (Mitigation Measure AQ-1) and requirements for Tier 4 off-road emission standards for construction equipment (Mitigation Measure AQ-2). Accordingly, impacts were found to be less than significant.

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

2020 EIR: *c) Expose sensitive receptors to substantial pollutant concentrations?*

Impacts to Sensitive Receptors
The 2020 EIR analyzed impacts to sensitive receptors by comparing Project emissions to Localized Significance Thresholds (LST) for Source Receptor Area (SRA) 30 (Coachella Valley). The nearest sensitive receptors to the Project site 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. The EIR used the five-acre look up table at a distance of 25 meters to screen for potential localized air quality impacts

The following table from the 2020 EIR shows that LST thresholds were 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 were determined to be "less than significant."

2020 EIR Table 2.4-7
Localized Significance Thresholds
(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: 2020 EIR Table 2.4-7, p. 2.4-12.
CalEEMod Version 2016.3.2, see Appendix B of 2020 EIR.
LST Threshold: LST Mass Rate Look-up Table, 25 meters, 5 acres, SCAQMD.

2020 EIR: *d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?*

Impacts from Other Emissions (Odors)
The 2020 EIR determined the Project had the potential to result in short-term odors associated with construction activities and use of heavy equipment, and long-term operational odors from onsite food service facilities. However, the 2020 EIR concluded that odor emissions from construction would be mitigated with implementation of Mitigation Measures AQ-2[10], SCAQMD Rule 402 compliance, and that operational emissions would be mitigated with installation of required ventilation systems. The 2020 EIR concluded that impacts would be "less than significant with mitigation."

2020 EIR: Summary of Impacts to Air Quality
The 2020 EIR concluded that the Project would not interfere or obstruct applicable air quality management plans nor would it result in a cumulatively considerable net increase in regional PM10 or ozone levels, due to limited Project emissions that did not exceed SCAQMD thresholds. Furthermore, the Project would not result in significant impacts to sensitive receptors, pose significant health risks, or result in other emissions such as odors. Overall, impacts to air quality were found to be less than significant.

2020 EIR: 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.

[10] Text in the 2020 EIR references "Mitigation Measure AQ-3" as being the SCAQMD Rule 402 measure; however, the correct reference is Mitigation Measure AQ-2. Reference to AQ-2 was used in this Addendum to avoid confusion with the mitigation measures listed in the section.

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.

2.4.2: Comparison of 2020 EIR vs 2026 PDP Minor Mod No. 1 Project

The proposed PDP Minor Mod No. 1 project will have equivalent or less impacts compared to those identified in the 2020 Certified EIR. Site development was initiated at the project site following certification of the 2020 EIR and included improvements to Vista del Sol, construction of a decorative wall and parkway landscaping, access drive and stormwater retention basin. The eastern-most portion of the project site has been graded, and a portion of this area has been developed with new parking. Some of the associated impacts to air quality analyzed in 2020 have occurred. However, approved demolition of four existing residential buildings and construction of two new residential buildings has not yet occurred. Also, the approved day-treatment building has not yet been constructed.

The proposed PDP Minor Mod No. 1 project will reduce the extent of demolition, and limit new construction and associated site disturbance. It will include a new Dining Hall building on an existing parking lot, and interior modifications to the Daniels Children's Pavilion. PDP Minor Mod No. 1 would also replace the planned but unbuilt Day-Treatment Building with a redesigned Residence Hall building just north of the previously planned location of the Day-Treatment Building. In the overall, the PDP Minor Mod No. 1 project will result on an overall reduction in impacts to air quality.

The following table compares the CalEEMod input data used for the 2020 EIR and the proposed PDP:

Table 2-1
CalEEMod Input Comparison Summary
2020 EIR v. PDP Minor Mod No. 1

	2020 EIR Project	PDP Minor Mod No. 1
Buildout Duration	2.5 years	2 years
Building Demolition/Renovation	51,694 SF demolition	312 tons debris removal from renovation 1,575 CY or 3,187 tons asphalt/concrete removal[2] Note: No building demolition proposed, renovations will occur in 57,414 SF of building space (51,694 SF of existing residential buildings and 5,720 SF of Daniels Building).[1]
Grading Net Material Import/Export	26,217 CY Export	11,000 CY import
Material Hauling Distance	20 miles	20 miles
Construction Equipment List	Project-specific equipment list in Appendix B of 2020 EIR	CalEEMod default construction equipment list, due to changes in Project description, particularly eliminated demolition.
Building Construction	• Day treatment ("Hospital"): 22,748 SF and 56 new beds, total of 156 beds and 120,457 square feet of treatment/office/ amenities when combined with existing uses • "General Office": 49,667 SF Note: The 2020 EIR analysis assumed full buildout of the HBFC campus (including existing facilities) and calculated the net increase in operational emissions from existing operations to the proposed 2020 project operations.	• "Congregate Care": 44,470 SF o Residence Building: 29,980 SF o Dining: 14,490 SF CalEEMod Land Use: "Congregate Care," includes living spaces with limited medical services and centralized amenities such as dining. Note: The current analysis only considers construction of new structures, not existing structures, to accurately describe Project-specific construction emissions.
New Asphalt and Concrete	Asphalt: 53,877 SF Non-Asphalt: 33,252SF Total Area: 87,129 SF (including both on-site and improvements along Vista Del Sol)	Asphalt: 53,200 SF (95%) Non-Asphalt: 2,800 SF (5%) Total Area: 56,000 SF (including new parking lot, internal drives and driveway expansion
Traffic Trip Generation	"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 2020 Project was approximately 560 trips. Analysis calculated emissions for full campus operations, 1,860 daily trips.	Consistent with the 2020 EIR, operational emissions were modeled in CalEEMod using the same gross daily trip generation rate of 1,860 trips assumed for full campus operations. This ensures direct comparison with the gross trips and emissions previously evaluated in the 2020 EIR.
Mitigation Measures	• Dust control (water unpaved roads/areas 2 times per day) • Tier 4 final engines all construction equipment	• Dust control (water unpaved roads/areas 2 times per day) • Tier 4 final engines all construction equipment

1. Assumes 10.84 lbs per SF of "Hospital" renovation assumptions per Table 2-6 (Summary of Nonresidential Renovation Job Site Surveys of C&D Materials), Estimating 2003 Building-Related Construction and Demolition Materials Amounts, US EPA https://www.epa.gov/sites/default/files/2017-09/documents/estimating2003buildingrelatedcanddmaterialsamounts.pdf
2. Assumes 6 inch thickness and 85,000 SF of asphalt to be removed. Calculation provided by online material calculator: https://reevescc.com/asphalt-calculator/, accessed December 23, 2025.

2.4.3: Analysis of Proposed Minor Mod No. 1 Project

With regard to potential additional impacts to air quality, the proposed PDP Minor Mod No. 1 project does not require any substantial changes to the 2020 certified EIR. No new environmental effects have been identified and overall potential impacts to air quality are expected to be less than, or comparable to, those analyzed in the 2020 EIR.

CalEEMod Version 2022.1 was used to project the Project's air quality emissions (EIR Addendum Appendix A). As shown in Tables 2-2 through 2-4, below, Project-specific construction and operational emissions will be below SCAQMD thresholds for criteria pollutants and LSTs (see Tables 2 through 4, below). Circumstances at the Project site and vicinity have not changed, nor have applicable regulations. Portions of the approved Project and associated potential pollutant emissions have already occurred, and daily emissions associated with construction of the PDP Minor Mod No. 1 project will be lower than originally calculated in the 2020 EIR. No new information of substantial importance has emerged, and no new environmental effects are expected to result from implementation of the proposed PDP modification.

Consistent with the 2020 EIR, the proposed PDP Minor Modification No. 1 would not conflict with or obstruct implementation of applicable air quality management plans. The modification would also not result in a cumulatively considerable net increase in PM10 or ozone precursors, as Project emissions remain below applicable SCAQMD significance thresholds. Additionally, the proposed modification would not expose sensitive receptors to substantial pollutant concentrations, result in significant health risks, or generate objectionable odors or other emissions. No new significant air quality impacts would occur under CEQA, and any potential impacts would be comparable in scope and intensity to those analyzed in the 2020 EIR. With continued implementation of the EIR mitigation measures, impacts will be less than significant.

Table 2-2
Construction Emissions Summary Comparison
2020 EIR v. PDP Minor Mod No. 1
(lbs./day)

Max. Daily Mitigated Emissions	CO	NO_x	ROG	SO_x	PM_{10}	$PM_{2.5}$
2020 EIR	91	25	42	0	4	2
Proposed PDP Minor Mod No. 1	20	5.4	6.6	0	3.6	1.6
Net Difference	*-71*	*-19.6*	*-35.4*	*--*	*-0.4*	*-0.4*
SCAQMD Threshold	**550**	**100**	**75**	**150**	**150**	**55**
Exceeds Threshold?	**No**	**No**	**No**	**No**	**No**	**No**

Source: 2020 EIR Table 2.4-5, p. 2.4-9; CalEEMod Version 2022.1. See Appendix A for detailed CalEEMod report, 12.23.25.

Table 2-3
Operational Emissions Summary Comparison
2020 EIR v. PDP Minor Mod No. 1
(lbs./day)

Scenario	CO	NO_x	ROG	SO_x	PM_{10}	$PM_{2.5}$
2020 EIR						
Existing Operation	*39*	*31*	*8*	*0*	*8*	*2*
2020 EIR Operation[1]	*42*	*29*	*8*	*0*	*11*	*3*
Net Difference	*+3*	*-2*	*0*	*0*	*+3*	*+1*
Proposed PDP Minor Mod No. 1						
Project Operations[2]	*56*	*6.8*	*7.7*	*0.13*	*11*	*2.9*
2020 EIR Comparison, Net Diff.	*+14*	*-22.2*	*-0.3*	*+0.13*	*--*	*-0.1*
SCAQMD Threshold 2020/2025[3]	**550/550**	**100/55**	**75/55**	**150/150**	**150/150**	**55/55**
Exceeds Threshold	**No**	**No**	**No**	**No**	**No**	**No**

Source: 2020 EIR Table 2.4-6, p. 2.4-10; CalEEMod Version 2022.1. See Appendix A for detailed CalEEMod report, 12.23.25.
1. Inclusive of all buildings and operations post-Project construction.
2. Inclusive of entire campus mobile trip emissions; all other emissions are Project-only, excluding all other emissions from existing operations.
3. In 2020, the SCAQMD operational air quality significance thresholds for the Coachella Valley were the same as SCAQMD construction air quality significance thresholds.

Table 2-4
Localized Significance Thresholds
2020 EIR v. PDP Minor Mod No. 1
(lbs per day)

Construction LST Threshold	CO	NO_x	PM_{10}	$PM_{2.5}$
2020 EIR	91	25	4	2
Proposed PDP Minor Mod No. 1	20	5.4	3.6	1.6
Net Difference	*-71*	*-19.6*	*-0.4*	*-0.4*
LST Threshold	2,292	304	14	8
Exceed?	No	No	No	No

Source: 2020 EIR Table 2.4-7, p. 2.4-12; CalEEMod Version 2022.1. See Appendix A for detailed CalEEMod report, 12.23.25.

2.5 Biological Resources

2.5.1: 2020 EIR: Summary of Findings (Section 2.5, page 2.5-1 et. seq.)

Background
The Hazelden Betty Ford Center site encompasses 26.22± acres and consists of the existing Hazelden Betty Ford Campus and 6.53± acres of partially developed land on the east and extending to Visa 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 the subject property with partial implementation of the 2020 PDP approval. Site soils are comprised of Myoma fine sand.

Vegetation

The limited undisturbed surrounding lands are of the 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[11]. 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 in the Project area 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[12] and has a low probability of occurring in the Project area due to the disruption of ecological processes that provide habitat for this plant.

Wildlife

Several Covered Species under the MSHCP associated with stabilized shielded desert sand dunes and fields may have the potential to occur on undeveloped or otherwise undisturbed surround lands[13] [14]. 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 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[15].

---

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

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

13 Coachella Valley Multiple Species Habitat Conservation Plan (CVMSHCP), P.10-35 & Figure 3-1.

14 Op. cit. Brandman 1992.

15 Coachella Valley Multiple Species Habitat Conservation Plan (CVMSHCP), P.10-33.

2020 EIR Impact Findings: Biological Resources

2020 EIR: *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?*

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 Project site is located 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.

2020 EIR: *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.*

Less Than Significant. The Project site is located within an urban environment and is surrounded by developed and previously disturbed lands, as well as remnant areas of vacant desert. 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.

2020 EIR: *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.

2020 EIR: *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 (see below), impacts are expected to be less than significant on species movement, migratory corridors or native wildlife nursery sites.

2020 EIR: *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.

2020 EIR: *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.

2020 EIR: Summary of Impacts to Biological Resources

As summarized above and as discussed in detail in the 2020 Certified EIR, it was determined that the proposed PDP project would have no or less than significant impacts on biological resources with the implementation of the mitigation measures reiterated below.

2020 EIR: 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.

2.5.2: Comparison of 2020 EIR vs 2026 PDP Minor Mod No. 1 Project

The proposed PDP Minor Mod No. 1 project will have equivalent or less impacts compared to those idented in the 2020 Certified EIR. Native land disturbance, which has already occurred, has been adequately mitigated. In addition, site disturbance associated with the replacement of four residential buildings will not occur and potential impacts to nesting birds and other sensitive wildlife in these portions of the site will not occur under the revised project. The proposed redesigned Residence Hall is planned in much the same location as the original Day-Treatment build, which has seen comparable disturbance of heretofore undisturbed lands. The proposed Dining Hall building would occur between the proposed Residence Hall and the Daniels Children Pavilion, which is currently occupied by parking lot. Therefore, as analyzed below, the proposed PDP Minor Mod No. 1 project would have comparable or less impacts to biological resources compared to the 2020 approved project.

2.5.3: Analysis of Proposed Minor Mod No. 1 Project

Based upon the extent of development that has occurred since the Project was approved in 2020 and the continuing conditions and isolation of surrounding undeveloped lands, the proposed PDP Minor Mod No. 1 project will not cause new or intensified impacts on local sensitive plant or wildlife communities. Impacts will be comparable to or lower than those determined in the 2020 EIR.

2.6 Cultural and Tribal Cultural Resources

2.6.1: 2020 EIR: Summary of Findings (Section 2.6, page 2.6-1 et. seq.)

Background
In November of 2019 archaeologists completed a records search at the Eastern Information Center (EIC), University of California, Riverside. 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.

In November 2019 archaeologists conducted field surveys 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.

Native American Participation
In 2019, a written request was sent 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 contacting local tribal authorities. Requests fore input were sent in November 2019 to representatives and/or chairmen of 11 tribes. 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.

2020 EIR Impact Findings: Cultural and Tribal Resources

Cultural Resources

2020 EIR: *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.

2020 EIR: *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.

2020 EIR: *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

2020 EIR: *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. In December 2019, the City of Rancho Mirage distributed invitations to consult to eleven (11) Native American tribes identified by the NAHC as having traditional lands or cultural places within City boundaries. Written responses have been received from five tribes.

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.

2020 EIR: Summary of Impacts to Cultural and Tribal Resources
As summarized above and as discussed in detail in the 2020 Certified EIR, it was determined that the proposed PDP project would have no or less than significant impacts on cultural and tribal resources with the implementation of the mitigation measures reiterated below.

2020 EIR: Mitigation Measures
As noted above, the Project's potential impacts to sensitive historic, archaeologic, tribal or other culturally sensitive 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).

2.6.2: Comparison of 2020 EIR vs 2026 PDP Minor Mod No. 1 Project

The proposed PDP Minor Mod No. 1 project will have equivalent or less impacts compared to those idented in the 2020 Certified EIR. Native land disturbance, which has already occurred, has been adequately mitigated. In addition, site disturbance associated with the replacement of four residential buildings will not occur. The proposed redesigned Residence Hall is planned in much the same location as the original Day-Treatment build, which has seen comparable disturbance of heretofore undisturbed lands. The proposed Dining Hall building would occur between the proposed Residence Hall and the Daniels Children Pavilion, which is currently occupied by parking lot. Therefore, as analyzed below, the proposed PDP Minor Mod No. 1 project would have comparable or less impacts to historical, cultural or tribal resources compared to the 2020 approved project.

2.6.3: Analysis of Proposed Minor Mod No. 1 Project

Based upon the extent of development that has occurred since the Project was approved in 2020 and the lack of any sensitive cultural or tribal resources encountered, the proposed PDP Minor Mod No. 1 project will not cause new or intensified impacts on sensitive historic, cultural or tribal resources. Impacts will be comparable to or lower than those determined in the 2020 EIR.

2.7 Geology and Soils

2.7.1: 2020 EIR: Summary of Findings (Section 2.7, page 2.7-1 et. seq.)

Background

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] 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 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 in the 2020 EIR and geotechnical report.

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.[20]

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.

---

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.

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

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 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.

Collapsible and Expansive 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 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, 2020 EIR 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.[21] 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.

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).

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

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.[22] 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.[23]

2020 EIR Impact Findings: Geology and Soils

2020 EIR: *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?

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 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. 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?

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

[23] 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.

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. 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 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. 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.[24] 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 below will ensure impacts regarding unstable soils and associated potential hazards are reduced to less than significant levels.

[24] Ibid.

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.

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 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 would occur.

2020 EIR: Summary of Impacts Associated With Geology and Soils
As summarized above and as discussed in detail in the 2020 Certified EIR, it was determined that the proposed PDP project would have no or less than significant impacts resulting from geological and/or soils conditions with the implementation of the mitigation measures reiterated below.

2020 EIR: Mitigation Measures
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.

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.

2.7.2: Comparison of 2020 EIR vs 2026 PDP Minor Mod No. 1 Project

The proposed PDP Minor Mod No. 1 project will have equivalent or less impacts compared to those idented in the 2020 Certified EIR. Local geology and soils have not changed and conditions at the site support the proposed project, including Minor Mod No. 1. Site and soils engineering discussed in the 2020 EIR to support proposed development remain applicable. Previously planned two-story residence buildings will not be constructed under the PDP Minor Mod No. 1 Project. Site development pursuant to the 2020 PDP approval confirm and validate previous analysis and recommendations. Therefore, the proposed PDP Minor Mod No. 1 project would have comparable or less impacts associated with local or regional geology and soils conditions compared to the 2020 approved project.

2.7.3: Analysis of Proposed Minor Mod No. 1 Project

Based upon the extent of development that has occurred since the Project was approved in 2020 and the confirmation of previous analysis and prescription of site and soils engineering, the proposed PDP Minor Mod No. 1 project will not cause new or intensified impacts. Impacts will be comparable to or lower than those determined in the 2020 EIR.

2.8 Greenhouse Gas Emissions

2.8.1: 2020 EIR: Summary of Findings (Section 2.8, page 2.8-1 et. seq.)

Background
As described in the 2020 EIR, 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). 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 429 ppm[25]. 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.[26]

The 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 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.

2020 EIR Impact Findings: Greenhouse Gas Emissions

2020 EIR: *a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.*

Impacts from Greenhouse Gas Emissions on the Environment
As described in the 2020 EIR, the 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. Consistent with the air quality analysis, CalEEMod Version 2016.3.2 was used to estimate Project-related GHG emissions during the construction phase, and annual operational emissions in the 2020 EIR.

Construction GHG Emissions
For analysis purposes, the 2020 EIR assumed construction would occur over a 2.5-year period. Project construction data have been applied to the CalEEMod model. 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. See Section 2.4 Air Quality for a detailed summary of CalEEMod input assumptions used in the 2020 EIR.

[25] Global Carbon Emissions for December 2025, NOAA, published 7//28/2025. Website accessed 7.28.25. https://gml.noaa.gov/ccgg/trends/

[26] "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.

As shown in Table 2.8-1 of the 2020 EIR, the 2020 Project would result in a total of 2,635 MTCO2e over the 2.5-year buildout period. To determine if construction emissions would 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.[27] Standard emission control requirements were applied to construction.

Operational GHG Emissions

As described in the 2020 EIR, 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 2020 Project's emissions to determine the net impacts associated with the proposed renovation and expansion.

In 2008, the SCAQMD formally adopted a greenhouse gas significance threshold of 10,000 $MTCO_2e$/yr that only applies to stationary source projects. This threshold was adopted based upon an October 2008 staff report and draft interim guidance document[28] 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 several "tiered" tests. The 2020 EIR emission data shows that overall operational emissions associated with the 2020 Project would be higher than the existing HBFC due to the increased number of beds and facilities, and mobile trips. However, the 2020 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.

2020 EIR 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]	--	--	*2,635*	--	*+ 2,635*
Operation	*3,258*	*32.58*	*4,247*	*27.22*	*+ 989 / -5.36*
Amortized Construction Emissions[2]	--	--	*88*	--	*+ 88*
Operation at Buildout plus Amortized Construction Emissions	**3,258**	**32.58**	**4,335**	**27.22**	**+ 1,077**
Exceeds Tier 3 (3,000 MT/yr) Threshold?					**NO**

Source: 2020 EIR Table 2.8-1, p. 2.8-7. CalEEMod Version 2016.3.2. See Appendix B of 2020 EIR for detailed tables.
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. 2,635/30 = 88.

Overall, the 2020 EIR concluded that the Project would result in the net increase of 1,083 $MTCO_2e$/yr and would not exceed SCAQMD GHG emission threshold of 3,000 $MTCO_2e$/yr. Impacts related to direct or indirect GHG emissions are found to be "less than significant."

2020 EIR: *b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.*

27 "Interim CEQA GHG Significance Threshold for Stationary Sources, Rules and Plans," SCAQMD, December 5, 2008.
28 Draft Guidance Document – Interim CEQA Greenhouse Gas (GHG) Significance Threshold, prepared by SCAQMD, October 2008.

Impacts to GHG Reduction Plans, Policies, or Regulations
The 2020 EIR states that all components of construction and operation would be subject to current SCAQMD rules and regulations related to greenhouse gases, including source-specific standards that reduce the greenhouse gas content in engines and limit equipment idling durations. The 2020 Project would 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 had not been updated with new baselines or revised projections at the time of the 2020 EIR, and therefore it was not possible to know if the City had achieved it's AB 52 goals. However, the 2020 Project was considered consistent with the Sustainability Plan because it adhered to its reduction measures. In addition, since the 2020 Project was replacing older infrastructure with new, all new buildings would be constructed in accordance with the California Building Code which requires the application of sustainable building technologies in new and major remodel construction.

The 2020 EIR concluded that the Project complied with the applicable City GHG reduction strategies contained in the City's Sustainability Plan and SCAQMD regulations. Therefore, the 2020 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 were determined to be "less than significant."

2020 EIR: Summary of Impacts Associated Greenhouse Gas Emissions
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.

2020 EIR: Mitigation Measures
The 2020 Project dis not exceed GHG thresholds and impacts were found to be less than significant, therefore no mitigation measures were required.

2.8.2: Comparison of 2020 EIR vs 2026 PDP Minor Mod No. 1 Project

The proposed PDP Minor Mod No. 1 project will have equivalent or less impacts compared to those identified in the 2020 Certified EIR. Site development was initiated at the project site following certification of the 2020 EIR and included improvements to Vista del Sol, construction of a decorative wall and parkway landscaping, access drive and stormwater retention basin. The eastern-most portion of the project site has been graded, and a portion of this area has been developed with new parking. Some of the associated GHG emissions analyzed in 2020 have occurred. However, approved demolition of four existing residential buildings and construction of two new residential buildings and the day-treatment building has not yet occurred. The proposed PDP Minor Mod No. 1 project will greatly reduce the extent of demolition, new construction and associated site disturbance. It will include a new Dining Hall building on an existing parking lot, and interior modifications to the Daniels Children's Pavilion. PDP Minor Mod No. 1 would also replace the planned but unbuilt Day-Treatment Building with a redesigned Residence Hall just north of the previously approved location of the Day-Treatment Building. In the overall, the PDP Minor Mod No. 1 project will result on an overall reduction in GHG emissions and associated impacts.

2.8.3: Analysis of Proposed Minor Mod No. 1 Project

With regard to potential additional impacts from GHG Emissions, the proposed PDP Minor Mod No. 1 project does not require any substantial changes to the 2020 certified EIR. No new environmental effects have been identified and overall potential impacts to air quality and GHG emissions are expected to be less than those analyzed in the 2020 EIR.

CalEEMod Version 2022.1 was used to project the Project's GHG emissions (see Addendum Appendix A). See Table 2-1 in Section 2.4, Air Quality, for a comparison the CalEEMod input data used for the 2020 EIR and the proposed PDP. As shown in Table 2-5 below, Project-specific emissions will be below SCAQMD's Tier 3 threshold and would result in 2,122 fewer $MTCO_2e$ compared to the 2020 EIR. Circumstances at the Project site and vicinity have not changed, nor have applicable regulations. Portions of the approved Project and associated potential GHG emissions have already occurred, and daily emissions associated with construction of the PDP Minor Mod No. 1 project will be lower than originally calculated in the 2020 EIR.

Consistent with the 2020 EIR, the proposed PDP Minor Modification No. 1 would not conflict with or obstruct implementation of applicable GHG emission reduction plans. No new significant GHG emissions impacts would occur under CEQA, and any potential impacts would be reduced in scope and intensity to those analyzed in the 2020 EIR. Impacts will remain less than significant.

Table 2-5
Greenhouse Gas Emissions Summary
2020 EIR v. PDP Minor Mod No. 1

	Baseline (Existing) Conditions MT CO_2e/Yr	**2020 EIR Project Total** MT CO_2e/Yr	**Baseline v. 2020 EIR Net Diff.** MT CO_2e/Yr	**PDP Minor Mod No. 1 Total** MT CO_2e/Yr	**Net Diff. 2020 EIR v. PDP Minor Mod No. 1**
Construction[1]	--	*2,635*	*+ 2,635*	*714*	*-1,921*
Operation	*3,258*	*4,247*	*+ 989*	*2,149*	*-2,098*
Amortized Construction Emissions[2]	--	*88*	*+ 88*	*64*	*-24*
Operation at Buildout plus Amortized Construction Emissions	**3,258**	**4,335**	**+ 1,077**	**2,213**	**-2,122**
Exceeds Tier 3 (3,000 MT/yr) Threshold?			**NO**	**NO**	**NO**

Source: 2020 EIR Table 2.8-1, p. 2.8-7. CalEEMod Version 2016.3.2. See Appendix B of 2020 EIR for detailed tables; CalEEMod Version 2022.1. See Appendix A for detailed CalEEMod report, 12.23.25.
1. Construction GHG emissions are the total combined emissions from all construction years. Total construction emissions are not added to total operational emissions
2. Buildout construction GHG emissions were amortized over 30 years then added to buildout operational GHG emissions.

2.9 Hazards and Hazardous Materials

2.9.1: 2020 EIR: Summary of Findings (Section 2.9, page 2.9-1 et. seq.)

Background

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.[29]

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 the 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.[30] Neither did the Phase I study identify any significant up-gradient releases of hazardous materials that could impact the subject property.

---

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

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

2020 EIR Impact Findings: Hazards and Hazardous Materials

2020 EIR: *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. The proposed (2020) 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.

2020 EIR: 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.

2020 EIR: 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.

2020 EIR: *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.

2020 EIR: *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.

2020 EIR: *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.

2020 EIR: Summary of Impacts Associated With Hazards and Hazardous Materials
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.

2020 EIR: 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.

2.9.2: Comparison of 2020 EIR vs 2026 PDP Minor Mod No. 1 Project

The proposed PDP Minor Mod No. 1 project will have equivalent or less impacts compared to those identified in the 2020 Certified EIR. Current site conditions include new improvements along Vista del Sol, a new access drive and stormwater retention basin, and additional parking. Overall, site conditions have not otherwise changed. Conditions at the site continue support the proposed Project, including PDP Minor Mod No. 1. Site conditions, hazards typically associated with construction and operational hazards discussed in the 2020 EIR to support proposed development remain applicable.

Proposed PDP Minor Mod No. 1 Project has the potential to generate less hazardous wastes and other materials during construction and operation. Risks associated with accidental releases of hazardous materials will be equivalent to or less than that associated with the approved 2020 Project. There will be no new potential impacts to emergency accessibility or exposure to a wildfire risk. Previously planned two-story residence buildings will not be constructed under the PDP Minor Mod No. 1 Project. Site development pursuant to the 2020 PDP approval confirm and validate previous analysis and recommendations. Therefore, the proposed PDP Minor Mod No. 1 project would have comparable or less impacts associated with hazards and hazardous materials compared to the 2020 approved project.

2.9.3: Analysis of Proposed Minor Mod No. 1 Project

Based upon the extent of development that has occurred since the Project was approved in 2020 and the confirmation of previous analysis and prescription of programmatic standards and regulations, the proposed PDP Minor Mod No. 1 project will not cause new or intensified impacts. Impacts will be comparable to or lower than those determined in the 2020 EIR.

2.10 Hydrology and Water Quality

2.10.1: 2020 EIR: Summary of Findings (Section 2.10, page 2.10-1 et. seq.)

Background
The Project site is located within the Whitewater River Hydrologic Unit or the Whitewater River watershed; the Whitewater River is the principal drainage course in the Coachella with a drainage area of approximately 850 square miles. The Project site and surrounding lands generally slope south and southeast toward the Whitewater River. The 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.

Project Stormwater Management Plan
Proposed Project improvements (as approved in 2020 and as proposed in PDP Minor Mod No. 1) will occur on both the currently developed portions of the HBFC campus and its easterly vacant 6-acres (excepting new parking) located along the eastern boundary. 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 (2020) conditions and will not require additional peak flow mitigation. Most stormwater flows on the existing HBFC site would continue to drain to the pond located on the southwestern portion of the site.

The eastern Project 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). In 2025, these basins and the adjacent access road have been built and are functional.

Water Resources and Quality
With very limited exceptions, domestic water is supplied from wells pumping groundwater from the Whitewater River Subbasin with an estimated 10.5 to 14.2 million acre-fee in storage in the first 1000 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. CVWD is actively expanding lines to deliver treated wastewater and Colorado River water as an additional urban supply. 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.[31]

2020 EIR Impact Findings: Hydrology and Water Quality

2020 EIR: *a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality.*

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

Less than Significant with Mitigation. The Project will not create pollution, contamination, or nuisance as defined in Section 13050 of the California Water Code (CWC) or cause regulatory standards to be violated. The Project will comply with State Regional Water Quality Control Board (SWRCB) standards for the protection of water quality. 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 2020 EIR, Appendix I).

The proposed Project (including PDP Minor Mod No. 1) provides for on-site stormwater management, treatment and storage. On-site stormflows are directed toward retention basins via a series of storm drains and catch basins located along the western and eastern portions of the site. The proposed (now constructed) retention basins on the east retain 100 percent of stormwater flows from a 100-year storm event and provide filtration to remove pollutants from stormwater runoff. Basin landscaping also provides additional bioremediation by naturally detoxifying potential stormwater contaminants.

Summary
On-site retention basins will retain 100 percent of stormwater flows from a 100-year storm event. The Project will comply with NPDES regulations and the BMPs set forth in the Project-specific WQMP. 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. 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 and the implementation of mitigation measures ensure impacts will be less than significant.

2020 EIR: *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 increase CVWD's 2020 baseline water demand by 0.02 percent, representing a de minimis 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.

2020 EIR: *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 (occurred under 2020 approval). 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. The developer will retain 100 percent urban stormwater runoff on site. There

are currently three existing retention basins on-site that serve the needs of the current HBFC campus and its planned expansion. The approved 2020 Project includes the removal of four single-story residential buildings and replacing these with two 2-story buildings; these residences would remain under the proposed PDP Minor Mod No. 1. A new single-story day-treatment building will also be built west of Vista Del Sol on a portion of the currently vacant east area of the campus site (ancillary parking built since 2020).

Two new retention basins will also be constructed (already built) immediately south of the day-treatment building and on either side of the now built Vista Del Sol access drive. Landscaping and revegetated relies on a low to moderate water demand native mix of succulents, cacti, groundcover, shrubs and trees and will generate no new runoff. 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 best management practices (BMPs), 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. The Project will not impede or redirect flood flows either generated on site or in the Project vicinity. A new block wall is proposed (now constructed) 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 it 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 in the southwest corner of the campus and has a minimal potential to generate waves in a strong seismic event. 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 Project includes facilities to 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. 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 2020 EIR, 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.

2020 EIR: 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.

HYD-2 The Project shall be subject to NPDES Construction General Permit requirements.

2.10.2: Comparison of 2020 EIR vs 2026 PDP Minor Mod No. 1 Project

As with the approved 2020 PDP, the proposed PDP Minor Mod No. 1 project will have equivalent or less impacts compared to those identified in the 2020 Certified EIR. The revised project will not violate water quality standards, will not substantially decrease regional groundwater supplies and will not impede groundwater recharge. Also, consistent with the findings of the 2020 EIR, PDP Minor Mod No. 1 will not result in substantial soil erosion or siltation, increase the rate of surface runoff from the site, and will not exceed capacity of planned and built on-site retention basins. Neither the 2020 Project or PDP Minor Mod No. 1 project would impede or redirect stormflows and would not be subject tsunamis or seiches that could cause inundation and release of pollutants. Neither the 2020 approved Project nor proposed PDP Minor Mod No. 1 would conflict with or obstruct implementation of a water quality control plan. The approved 2020 EIR mitigation measures set forth below will ensure that impacts to hydrologic conditions and water quality and resources will be less than significant.

2.10.3: Analysis of Proposed Minor Mod No. 1 Project

The approved 2020 EIR and associated PDP approval permitted a substantially broader project that would have included extensive building demolition and construction of two four building. Under the proposed PDP Minor Mod No. 1 project, four existing residential buildings would remain, and associated site disturbance would be avoided. The previously approved Vista del Sol access drive and retention basins have already been constructed and will serve the proposed Minor Mod No. 1 project as built. Recently built parking would be relocated north of the new access drive and south of the proposed Residence Hall. The proposed Dining Hall would be built at the location of existing parking and would not result in an increase in surface runoff in this area of the site. Based on this analysis, with the continued implementation of the mitigation measures set forth in the certified 2020 EIR, the proposed PDP Minor Mod No. 1 project would have the same less than significant impacts to hydrology and water supplies and quality.

2.11 Land Use/Planning

2.11.1: 2020 EIR: Summary of Findings (Section 2.11, page 2.11-1 et. seq.)

Background
The Hazelden Betty Ford Center (HBFC) 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. 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.

The HBFC site 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. Development of Eisenhower Medical Center campus began 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 was the Wilshire Palms development to the south and Rancho Mirage Country Club to the north.

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. 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 (RMCC). RMCC 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 RMCC. 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.

2020 EIR Impact Findings: Land Use/Planning

2020 EIR: *a) Physically divide an established community.*

No Impact. The subject HBFC campus is a contiguous land holding that extends west 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 (or proposed PDP Minor Mod No. 1 project). Therefore, the proposed Project will not divide an established neighborhood or community.

2020 EIR: *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. The Project is an expansion of capital improvements and land uses 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.

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. 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.

2020 EIR: 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.

2.11.2: Comparison of 2020 EIR vs 2026 PDP Minor Mod No. 1 Project

Neither the approved 2020 Project nor the proposed PDP Minor Mod No. 1 project will divide physically or otherwise an existing, established community, both occurring within the boundaries of the existing HBFC property. The proposed PDP Minor Mod No. 1 project will have a lower potential for and will not generate any significant environmental impacts through land use conflicts, or compliance with any plan, policy or regulation adopted to avoid environmental impacts. Impacts from the approved 2020 Project and the proposed PDP Minor Mod No. 1 project will be less than significant.

2.11.3: Analysis of Proposed Minor Mod No. 1 Project

The approved 2020 EIR and associated PDP approval permitted a substantially broader project that would have included extensive building demolition and construction of two four building. Under the proposed PDP Minor Mod No. 1 project, four existing residential buildings would remain, and associated site disturbance would be avoided. The previously approved Vista del Sol access drive and retention basins have already been constructed and will

serve the proposed Minor Mod No. 1 project as built. Recently built parking would be relocated north of the new access drive and south of the proposed Residence Hall. The proposed Dining Hall would be built at the location of existing parking. Improvements and land uses proposed in PDP Minor Mod No. 1 would not divide an established community and would not result in any land use conflict or significant environmental impact through compliance with any plan, policy or regulation adopted to avoid environmental impacts. Impacts would be less than significant.

2.12 Mineral and Energy Resources

2.12.1: 2020 EIR: Summary of Findings (Section 2.12, page 2.12-1 et. seq.)

Background

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 substantial and important deposits of these materials that occur within the region that are being actively developed. 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)[32] and updated in 2007 (Special Report 198).[33] In Rancho Mirage lands south of I-10 are within MRZ-1 and MRZ-3.[34]

The Palm Springs Production-Consumption (P-C) Region is a 631 square mile area in the Coachella Valley that is heavily mined for aggregate. [35, 36] According to California Geological Survey, the Palm Springs P-C Region contains 3.2± billion tons of aggregate resources.[37] The Coachella Valley has eleven permitted aggregate operations, which contain approximately 167 million tons of permitted resources (reserves).[38] 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.[39] 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.[40] In addition, the Project site is partially developed and is surrounded by existing urban development, making it unsuitable for mineral extraction operations.

---

32 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.

33 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.

34 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.

35 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.

36 The Palm Springs Production-Consumption Region generally extends from Cabazon on the west to Mecca on the east.

37 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.

38 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.

39 Ibid.

40 Ibid.

Energy resources used or that may be used at the Project include electricity and natural gas, as well as on-site photovoltaic solar. Currently, Southern California Edison (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 the 2020 EIR, Section 2.12.6, Project Impacts. 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 (in 2020 planned to be demolished) and further east from along the north side of the existing pool (to remain).

2020 EIR Impact Findings: Mineral and Energy Resources

Mineral Resources

2020 EIR: *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.

2020 EIR: *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.

Energy Resources

2020 EIR: *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. As described in the 2020 EIR, energy would be consumed during construction in three general forms: petroleum-based fuels, electricity and 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. 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 and electricity demand would be temporary, nominal, and would cease upon the completion of construction. 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.

Natural Gas: Construction of the three new buildings (2020 PDP approval), a primary access road, and ancillary site modifications typically would not involve the consumption of natural gas. Construction involves 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 in coordination with SoCalGas. 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. It is expected that most construction workers will live locally, which would minimize the need for long commutes and limit fuel consumption. The CalEEMod air quality model assumed that most construction workers will live locally. Long-term operation of the Project will result in additional VMTs, which are further discussed below under "Operational Energy Demands" below. 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 approved 2020 PDP project's net change in energy demand would mainly come from the difference in demands of new buildings, plus the change in VMTs due to improved facility and treatment capacity and new direct access resulting from the new access 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 (2020) annual electricity consumption at the Betty Ford Center is approximately 3,609,651 kWh, equivalent to 26.31 kWh per square foot building area.[41] 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, 2020 approved 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 approved 2020 Project would use natural gas for heating, cooking, and domestic hot water. Current (2020) annual natural gas consumption at the Betty Ford Center is approximately 70,968 therms, equivalent to 0.52 therms per building square footage.[42] 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.

41 SCE electricity statements for the Betty Ford Center, December 2018 through January 2020.
42 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[43], 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 not all Project VMTs will occur solely within the City's boundaries. 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.

2020 EIR: *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.

2020 EIR: Mitigation Measures

Given the Project's less than significant impacts, no mitigation measures are required.

2.12.2: Comparison of 2020 EIR vs 2026 PDP Minor Mod No. 1 Project

Neither the approved 2020 Project nor the proposed PDP Minor Mod No. 1 project will result in the loss of otherwise available and valuable mineral resources. Impacts for both PDP scenarios will be less than significant. The approved 2020 Project would result in somewhat greater demand for energy and local mineral (sand and aggregate) with the demolition of four buildings and construction of three new structures. The proposed PDP Minor Mod No. 1 would preserve the four existing residence buildings and limit new construction to the Residence Hall and Dining Hall. As noted, PDP Minor Mod No. 1 also includes modifications to the Daniels Children's Pavilion. Both the 2020 approved PDP and proposed Minor Mod No. 1 will have less than significant impacts on energy and mineral resources.

2.12.3: Analysis of Proposed Minor Mod No. 1 Project

Under the proposed PDP Minor Mod No. 1 Project, four existing residential buildings would remain, and associated site disturbance and commitment of energy and mineral resources would be avoided. The previously approved Vista del Sol access drive and retention basins have already been constructed and will serve the proposed Minor Mod No. 1 project as built. Recently built parking would be relocated north of the new access drive and south of the proposed Residence Hall. The proposed Dining Hall would be built at the location of existing parking.

Electricity

According to the 2020 EIR, the approved Project was projected to consume an additional 521,146 kWh per year of electricity at build out. Based on the CalEEMod report in Appendix A, the proposed PDP Minor Mod No. 1 is projected to consume 388,606 kWh per year, or a decrease of132,540 kWh compared to the 2020 Project.

[35] CalEEMod outputs and Project-specific data (see 2020 EIR Appendix B).

Natural Gas
For natural gas, the approved Project was projected to consume an additional 17,030 therms per year of natural gas at build out. The proposed PDP Minor Mod No. 1 is projected to consume 7,736 therms per year (773,569 kBTU), or a decrease of 9,294 therms compared to the 2020 Project.

Transportation Energy
During operation, the 2020 Project was projected to result in an additional 1,453,970 vehicle miles traveled to and from the Project site, resulting in the consumption of petroleum-based fuels related to vehicular travel. According to the CalEEMod outputs in Appendix A, the proposed PDP Minor Mod No. 1 is projected to result in an additional 2,391,566 vehicle miles traveled per year (compared to the baseline of 3,103,217 VMT annually), or an increase of 937,596 vehicle miles traveled compared to the 2020 Project.

The increase in VMT in the current CalEEMod model run compared to the 2020 Project is attributable to differences in trip length inputs. The 2020 analysis relied on an older modeling platform and project-specific trip lengths were not explicitly documented. Therefore, this analysis conservatively applied CalEEMod's default trip length values which resulted in higher estimated VMT. The same daily trip rates were applied to the current CalEEMod model run, therefore it is reasonable to assume that actual annual VMT would be comparable to that previously analyzed in the 2020 EIR.

Overall, the proposed PDP Minor Mod No. 1 project would have equivalent or lower impacts on energy and mineral resources, and impacts would be less than significant.

2.13 Noise

2.13.1: 2020 EIR: Summary of Findings (Section 2.13, page 2.13-1 et. seq.)

Background
Noise monitoring associated with the 2020 EIR was conducted in December of 2019 and was considered to assess the existing ambient noise environment in the Project study area. These measurements are considered representative of the noise environment at the Project site today. Measurement locations were positioned as close to the nearest sensitive receptor locations surrounding the Project site as possible, including the Barbara Sinatra Children's Center, EMC medical offices and along Vista del Sol. Daytime noise levels ranged from 51.5 to 61.6 dBA Leq, while evening noise levels ranged from 49.0 to 52.4 dBA Leq.

Existing Off-Site Traffic Noise
Noise associated with existing (2019) traffic noise levels along Bob Hope Drive, Vista Del Sol, John Sinn Road and other local streets in the Project study area were modeled as measured from the center of each 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.

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. The five (5) sensitive receivers identified in the Project study area included the Barbara Sinatra Children's Center, Vista Del Sol, multi-family dwellings at Wilshire Palms to the south, and the Bannan and Desert Orthopedic buildings at EMC.

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.[44] 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.[45] Noise 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.

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.

2020 EIR Impact Findings: Noise

2020 EIR: *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. The Project's noise impacts are considered significant if induced traffic noise construction noise or operational noise exceed approximately ≥3 to ≥5 dBA CNEL or Leq. As summarized below, traffic, construction and operational noise associated with the approved 2020 PDP project did not exceed significance thresholds and would not be expected to do so under existing (2025) conditions.

Potential Construction Noise Impacts

The Project would generate noise during demolition, site preparation, grading, building construction, paving, and the application of architectural coatings. The highest noise impacts would occur when construction activities take place in proximity to nearest sensitive receiver locations. Noise prediction modeling for the (2020) 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.[46] These levels are less than the acceptable noise level threshold (85 dBA L_{eq}) (see DEIR 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 the 2020 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. Noise levels at sensitive receptors

44 Ali Tourkaman, Vice President Support Services, Eisenhower Medical Center Safety Department, March 2020.

45 "Environmental Impact Report for the Eisenhower Medical Center Specific Plan Amendment No. 3," page, III-121, City of Rancho Mirage, 2003.

46 Table 10-2, Hazelden Betty Ford Center Noise Impact Analysis, Urban Crossroads, February 9, 2020.

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. Therefore, operational noise impacts will be less than significant.

Potential Traffic Noise Impacts
The 2020 Project will generate additional traffic and traffic-related noise on off-site area roadways. The modeling and analysis of Project traffic's contribution to roadway noise was conducted at 14 different locations. Significance criteria ranged from 1.5 to 5.0 dBA increases. Project traffic impacts fell well below thresholds at all of the 14 locations modeled. Therefore, Project-related traffic noise impacts would be less than significant.

2020 EIR: *b) Generation of excessive groundborne vibration or groundborne noise levels?*
Less Than Significant Impact. Demolition and construction associated with the Project will generate short-term, intermittent, and localized groundborne vibration from the operation of trucks and heavy construction equipment. 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 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.[47] These values are less than the 80 VdB residential vibration thresholds identified by the Federal Transit Administration (FTA). Additionally, vibration levels at sensitive receptors 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.

2020 EIR: *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 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 of the DEIR, 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 DEIR 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.

[47] Table 10-4, Ibid.

2020 EIR: Mitigation Measures
Project impacts would be less than significant. No mitigation is required.

2.13.2: Comparison of 2020 EIR vs 2026 PDP Minor Mod No. 1 Project

Neither the approved 2020 Project nor the proposed PDP Minor Mod No. 1 project will result in construction, operational or traffic-related noise impacts that significantly impact sensitive receptors or others. No established threshold will be exceeded, although the approved 2020 Project would result in higher levels of demolition noise associated with the planned removal of four residence buildings; under the proposed PDP Minor Mod No. 1 project, these buildings would not be demolished. The proposed PDP Minor Mod No. 1 would preserve the four existing residence buildings and limit new construction to the Residence Hall and Dining Hall. As noted, PDP Minor Mod No. 1 also includes modifications to the Daniels Children's Pavilion. Both the 2020 approved PDP and proposed Minor Mod No. 1 will have less than significant impacts on the local noise environment.

2.13.3: Analysis of Proposed Minor Mod No. 1 Project

Under the proposed PDP Minor Mod No. 1 project, four existing residential buildings would remain, and associated site disturbance and associated noise impacts would be avoided. The previously approved Vista del Sol access drive, decorative block wall and retention basins have already been constructed and will serve the proposed Minor Mod No. 1 project as built. Recently built parking would be relocated north of the new access drive and south of the proposed Residence Hall. The proposed Dining Hall would be built at the location of existing parking. The proposed PDP Minor Mod No. 1 project would have equivalent or lower impacts on the local noise environment, and impacts would be less than significant.

2.14 Population, Housing and Socio-Economic Resources

2.14.1: 2020 EIR: Summary of Findings (Section 2.14, page 2.14-1 et. seq.)

Background
The Rancho Mirage population increased 30% between 2000 and 2010, from 13,249 to 17,218. The latest (2023) population estimate is 17,375. SCAG projects the City's population will grow to 25,000 by 2040. In 2019, there were 14,596 housing units in Rancho Mirage, the majority of which (54.5%) were single-family detached units. The vacancy rate was 38.7%. 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. 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.

<u>Disadvantaged Communities</u>
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". According to the most recent CalEnviroScreen 3.0 database update (June 2025), 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.

2020 EIR Impact Findings: Population, Housing and Socio-Economic Resources

2020 EIR: *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. The (2020) 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. 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 permanently relocate to Rancho Mirage because of the Project.

The Project would generate new temporary construction jobs and an estimated 20.8 longer-term jobs[48] 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.

2020 EIR: *b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?*

No Impact. The (2020) 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.

As discussed in Sections 2.15.4 and 2.15.5 of the 2020 DEIR, 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.

2020 EIR: Mitigation Measures

Impacts would be less than significant, and no significant or unavoidable impacts would occur.

[48] Ibid.

2.14.2: Comparison of 2020 EIR vs 2026 PDP Minor Mod No. 1 Project

Neither the approved 2020 Project nor the proposed PDP Minor Mod No. 1 project will induce substantial unplanned population growth in the area, but rather both the approved and proposed Project will consolidate existing operations and patient housing on-campus. Neither Project will induce development of new homes or businesses. Neither Project will displace existing peoples or housing or create the need for construction of new housing elsewhere. The proposed PDP Minor Mod No. 1 would preserve the four existing residence buildings (which would be renovated) and limit new construction to the Residence Hall and Dining Hall. As noted, PDP Minor Mod No. 1 also includes modifications to the Daniels Children's Pavilion. Both the 2020 approved PDP and proposed Minor Mod No. 1 will have less than significant impacts on population growth, the need for new housing, or impact a disadvantaged community. Impacts would be less than significant for both the approved 2020 Project and the proposed PDP Minor Mod No. 1.

2.14.3: Analysis of Proposed Minor Mod No. 1 Project

Under the proposed PDP Minor Mod No. 1 project, four existing residential buildings would remain and would be renovated and updated. The Residence Hall that would be built under the proposed PDP Minor Mod No. 1 project will housing patient that are currently housed off-site. The new Dining Hall will consolidate and provide for patient, staff, and administration dining. Overall, impacts associated with population, housing and environmental justice would be less than significant under the proposed PDP Minor Mod No. 1 project.

2.15 Public Services

2.15.1: 2020 EIR: Summary of Findings (Section 2.15, page 2.15-1 et. seq.)

Background

Fire Protection: The City of Rancho Mirage contracts with Riverside County Fire Department (RCFD) for fire protection services. Services provided by the RCFD include fire suppression, emergency medical, rescue, and fire prevention services. Under contract with the California Department of Forestry and Fire Protection (CALFIRE), 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 entered 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.

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. 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:[49]

[49] Provided by Lieutenant Robert Castro at Riverside County Sheriff's Department in August 2018.

Health Services: The RCFD provides paramedic services to the City of Rancho Mirage.[50] 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, the most relevant being the Eisenhower Medical Center (Eisenhower Health) located immediately west of the Project site at 39000 Bob Hope Drive in Rancho Mirage. The HBFC campus is within 1,000± feet of the EMC Emergency Room with direct campus to campus access.

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.[51] 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.[52] 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.

Parks: The City of Rancho Mirage has a total of 55 acres of park lands and an additional 29 acres dedicated for future parks.[53] 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.

2020 EIR Impact Findings: Public Services

2020 EIR: *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 construction-related ignition sources could 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 in a fire event.

50 Rancho Mirage General Plan 2017 – Page 104.
51 Desert Sands Unified School District Boundary Map; https://www.dsusd.us/sites/default/files/DSUSD_SchoolFacilities.pdf, accessed January 2019.
52 Desert Sands Unified School District; https://www.dsusd.us, accessed January 2019.
53 City of Rancho Mirage General Plan 2017 – Page 11.

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.[54] 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 bed 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 approved 2020 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,[55] and the Project will result in an estimated potential of 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 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 (2020 approved) 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 (has been built), 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 support future fire facilities. Project-related impacts to fire protection services and facilities would be less than significant.

Police Protection**:** Construction of the proposed (2020 approved) Project will result in a potential increase in the need for security to prevent theft or vandalism of construction materials and equipment. However, this potential impact can be minimized through compliance with standard safety measures, implementation of which will be reduced to less than significant levels. At buildout, the proposed Project would result in additional patients and 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 standards and measures set forth in the 2020 EIR will help reduce the potential increase in demand for police protection services.

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.[56] The Eisenhower Medical Center and Betty Ford Center share a street address, and the Sheriff's

54 "Incident Report by Location and Final Type, 1/1/2018 to 12/31/2019." CALFIRE/Riverside County Fire Department Records & Investigations.

55 Riverside County Fire Department Annual Report 2018.

56 Personal communication with Jennifer Benoit, Community Service Officer, Rancho Mirage Crime Prevention Division, February 4, 2020.

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 above, especially in terms of calls and responses. The Project is not expected to require new or physically altered police facilities 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.[57] 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. 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 residents in the DSUSD. Potential student generation is estimated to be a maximum of nine students (see Table 2.15-1 below, assuming 21 new households). The potential student increase represents less than 0.1% of DSUSD's current student body. 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.

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, and no new or altered facilities would be required to serve them.

Project patients will have access to a onsite swimming pool, extensive walking paths and generous landscaped open space areas. 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 potential 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.

2020 EIR: Mitigation Measures

Impacts will be less than significant. No mitigation measures are required.

[57] Desert Sands Unified School District - Fee Justification Study for New Residential and Commercial/Industrial Development, May 2018.

2.15.2: Comparison of 2020 EIR vs 2026 PDP Minor Mod No. 1 Project

Neither the approved 2020 Project nor the proposed PDP Minor Mod No. 1 project will require the construction of new or expansion of existing governmental facilities. The HBFC has been in operation and providing services to the community for almost four decades. The level of demand for public services has been low. Both the approved 2020 EIR and the proposed PDP Minor Mod No. 1 project would not induce significant environmental impacts associated with delivery of public services. Under both the approved and proposed PDP projects providers will be able to maintain acceptable service ratios, response times or meet performance objectives for public services.

2.15.3: Analysis of Proposed Minor Mod No. 1 Project

Under the proposed PDP Minor Mod No. 1 project, the demand for public services would not significantly increase, if at all. The basic services and operations at the HBFC and the level and intensity of the use would remain much as it is today. The proposed Minor Mod No. 1 project would preserve and update the four existing residential buildings, and would add a Residence Hall and Dining Hall in areas previously approved in 2020. Impacts to public services would be equivalent to existing demand, that associated with the approved 2020 EIR and that associated with the proposed PDP Minor Mod No. 1 Project.

2.16 Transportation and Traffic

2.16.1: 2020 EIR: Summary of Findings (Section 2.16, page 2.16-1 et. seq.)

Background
The 2020 EIR evaluated the then proposed PDP for potential conflicts with transportation programs, plans, ordinances and policies, including the CEQA guidelines. The potential of the project to create design or related hazards was also evaluated, as was the provision of adequate emergency access. Major roadways analyzed in detail included Vista Del Sol, Country Club Drive, Bob Hope Drive, and John Sinn Road. The availability of transit, bike paths and other multimodal facilities was also considered. Levels of Service (LOS) at nearby intersections, no longer a CEQA threshold criterium, was also analyzed on a policy basis. All eight (8) of the intersections analyzed were operating at LOS C or better, with the exception of Bob Hope Drive and Street A into the EMC campus, which was operating at LOS D during the AM peak hour and LOS E during the PM peak hour and which met signal warrants.
2020 EIR Impact Findings: Transportation and Traffic

2020 EIR: *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 2020 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). Near-term and long-term Project traffic forecasts were analyzed in the Traffic Impact Analysis (see 2020 EIR, 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
A comparison of existing (2019) and post-project traffic conditions shows that the Project would result in limited ADT increases throughout the study area. 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.

With the approved 2020 PDP, no Project-area intersections 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.

Long-Term LOS Analysis

The 2020 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. Intersection #1 (Bob Hope Drive & MacMillan Way) is projected to operate at an unacceptable LOS E during the PM peak hour without and with the Project. In addition, Intersection #2 (Bob Hope Drive & Street A) is projected to operate at an unacceptable LOS F during AM and PM peak hours without and with the Project.

With 2020 Project traffic, no study area intersection would be caused to operate at an 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 2020 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). A traffic signal would improve intersection operations from LOS F to LOS A.

Site Access Improvements

The Project proposes (now has) two intersections in the immediate HBFC campus area: 1) Vista Del Sol & Driveway 1, and 2) the existing Joe Friend Lane & Betty Ford Way. It was 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. Impacts of these intersections on internal traffic operations within the HBFC campus and on adjoining streets would be less than significant.

The 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. 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 2020 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.[58] No impact would occur.

2020 EIR: *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.

2020 EIR: *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 of the DEIR, 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 have been identified or 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.

2020 EIR: *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 (now constructed) 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 the potential for adverse impacts would be less than significant.

[58] Letter from Todd McDaniel of SunLine Transit Agency, to Ben Torres of City of Rancho Mirage, January 8, 2020.

2020 EIR: 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).

2.15.2: Comparison of 2020 EIR vs 2026 PDP Minor Mod No. 1 Project

Neither the approved 2020 Project nor the proposed PDP Minor Mod No. 1 project will conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities. Two currently impacted intersections would continue to be impacted with or without the 2020 approved Project or the proposed PDP Minor Mod No. 1 project. Minor Mod No. 1 would generate approximately 35.5 additional daily vehicle trips, a less than significant 2.4% increase over the 2020 approved project. Neither project makes a significant contribution to conditions at these two intersections.

Adjoining roadway improvements required under the 2020 PDP approval have already been made, access to transit is available and multimodal improvements are in place where called for in the City General Plan. Both projects are consistent with and do not violate CEQA Guidelines § 15064.3, subdivision (b) pertaining to reductions in vehicle miles traveled (VMTs). Neither project introduces any hazardous elements, designs or incompatible uses and site access is improved under both the approved 2020 PDP and the proposed PDP Minor Mod No. 1. Mitigation measures approved in 2020 would be applicable and effective in application to the proposed PDP Minor Mod No. 1 project.

2.15.3: Analysis of Proposed Minor Mod No. 1 Project

The proposed Minor Mod No. 1 project would preserve and update the four existing residential buildings originally planned for demolition and would add a Residence Hall and Dining Hall in areas previously approved for

development in 2020. Access onto Vista Del Sol approved in 2020 has already been build, as have boundary wall and parkway improvements. In addition, two stormwater retention basins planned north and south of the new Vista Del Sol access drive have also been built, as has a parking lot to the north. Secondary/emergency access has also been improved pursuant to the 2020 approved PDP project. Impacts to traffic and transportation services would be equivalent to existing demand, that associated with the approved 2020 EIR and that associated with the proposed PDP Minor Mod No. 1 project.

2.17 Utilities and Service Systems

2.17.1: 2020 EIR: Summary of Findings (Section 2.17, page 2.17-1 et. seq.)

Background

Water Service

Potable and non-potable water is provided to the City by the Coachella Valley Water District (CVWD). Water demand is supplied by wells pumping groundwater to above-ground storage reservoirs and an extensive network of distribution lines ranging from 2 to 36 inches in diameter.[59] 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. 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. In addition to an extensive water conservation program, 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 at its Cook Street Wastewater Reclamation Plant (WRP-10) in Palm Desert. 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.[60] 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 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. 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.

[59] Rancho Mirage 2017 General Plan, Chapter 9 Public Services and Facilities, p.99.
[60] Ibid, p.100.

Natural Gas

Natural gas is provided to the City of Rancho Mirage by the Southern California Gas Company (SoCalGas). 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.[61] This includes natural gas consumed by residential, commercial, and industrial land uses, and resorts and golf courses.

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.[62] 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.[63] 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.[64]

2020 EIR Impact Findings: Utilities and Service Systems

2020 EIR: *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.

61 Rancho Mirage Energy Action Plan 2013.
62 Rancho Mirage General Plan 2017, – Chapter 9 Public Services and Facilities, p.102.
63 Rancho Mirage Section 31 Specific Plan EIR, p.5.16.4-1.
64 Ibid.

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. 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. As discussed in the 2020 EIR, Section 2.10, Hydrology and Water Quality, the proposed Project, inclusive of existing development ion the site, 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.[65] 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[66]) at buildout. Considering that water efficiency improvements in the new (and renovated) buildings will also reduce wastewater generation, the 2,800-gallon wastewater generation projection may be an overestimate. Current (2020) 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 additional impervious surfaces in the Project area through the construction of new buildings, pedestrian pathways, parking lots, and internal roadways. As explained in DEIR Section 2.10, Hydrology and Water Quality, to fully capture the 100-year storm runoff at Project buildout, two retention basins will be (have

[65] 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.

[66] Coachella Valley Water District Sewer Service Rate Study Report, prepared by Stantec, May 16, 2017.

been) built on both sides of the new access road in the southerly portion of the site. 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, and impacts will be less than significant.

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.[67] The Project will connect to the nearest existing 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 (previously planned 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,[68] which is less than 0.2 percent increase in annual City-wide usage (City-wide usage was 10,593,308 therms in 2010[69]). 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.

2020 EIR: *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 2020 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 waste and that generated by construction activities will need to be recycled. This standard requirement will assure that impacts associated with construction waste remain less than significant.

---

67 See DEIR 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.

68 See DEIR 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.

69 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 DEIR 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[70] 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.[71] [72] 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.

2020 EIR: Mitigation Measures

No mitigation measures are required.

2.15.2: Comparison of 2020 EIR vs 2026 PDP Minor Mod No. 1 Project

Neither the approved 2020 Project nor the proposed PDP Minor Mod No. 1 project will require or result in the relocation of utilities or service systems. It has been demonstrated that CVWD has adequate water supplies and domestic water and wastewater infrastructure to serve the Project as approved in 2020 and as proposed in PDP Minor Mod No. 1. Adequate solid waste disposal facilities and services exist that do and can continue to serve the Project site for the foreseeable future. The proposed PDP Minor Mod No. 1 will result in a modest 3.8 percent increase in demand for utilities and service systems, and impacts will be less than significant.

2.15.3: Analysis of Proposed Minor Mod No. 1 Project

The proposed Minor Mod No. 1 project would preserve and update the four existing residential buildings originally planned for demolition and would be refurbished for higher more water and energy efficiency and use. The new Residence Hall and Dining Hall would largely consolidate existing uses and functions, moving off-site resident patients on site and providing state of the art buildings and facilities. The net change in building area and components of demand (beds, staff, facilities) for utilities and service systems would be limited and less than significant.

---

70 Hotel = 2 lb/room/day, CalRecycle.

71 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.

72 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.

Appendix A
CalEEMod Model Run for PDP Minor Mod No. 1. December 2025

for the

Hazelden Betty Ford Center
PDP Minor Modification No. 1

Betty Ford Center Expansion - Minor Modifications Detailed Report

Table of Contents

1. Basic Project Information

1.1. Basic Project Information

1.2. Land Use Types

1.3. User-Selected Emission Reduction Measures by Emissions Sector

2. Emissions Summary

2.1. Construction Emissions Compared Against Thresholds

2.2. Construction Emissions by Year, Unmitigated

2.3. Construction Emissions by Year, Mitigated

2.4. Operations Emissions Compared Against Thresholds

2.5. Operations Emissions by Sector, Unmitigated

2.6. Operations Emissions by Sector, Mitigated

3. Construction Emissions Details

3.1. Demolition (2026) - Unmitigated

3.2. Demolition (2026) - Mitigated

3.3. Grading (2026) - Unmitigated

3.4. Grading (2026) - Mitigated

3.5. Building Construction (2026) - Unmitigated

3.6. Building Construction (2026) - Mitigated

3.7. Building Construction (2027) - Unmitigated

3.8. Building Construction (2027) - Mitigated

3.9. Paving (2027) - Unmitigated

3.10. Paving (2027) - Mitigated

3.11. Paving (2028) - Unmitigated

3.12. Paving (2028) - Mitigated

3.13. Architectural Coating (2028) - Unmitigated

3.14. Architectural Coating (2028) - Mitigated

4. Operations Emissions Details

4.1. Mobile Emissions by Land Use

4.1.1. Unmitigated

4.1.2. Mitigated

4.2. Energy

4.2.1. Electricity Emissions By Land Use - Unmitigated

4.2.2. Electricity Emissions By Land Use - Mitigated

4.2.3. Natural Gas Emissions By Land Use - Unmitigated

4.2.4. Natural Gas Emissions By Land Use - Mitigated

4.3. Area Emissions by Source

4.3.1. Unmitigated

4.3.2. Mitigated

4.4. Water Emissions by Land Use

4.4.1. Unmitigated

4.4.2. Mitigated

4.5. Waste Emissions by Land Use

4.5.1. Unmitigated

4.5.2. Mitigated

4.6. Refrigerant Emissions by Land Use

4.6.1. Unmitigated

4.6.2. Mitigated

4.7. Offroad Emissions By Equipment Type

4.7.1. Unmitigated

4.7.2. Mitigated

4.8. Stationary Emissions By Equipment Type

4.8.1. Unmitigated

4.8.2. Mitigated

4.9. User Defined Emissions By Equipment Type

4.9.1. Unmitigated

4.9.2. Mitigated

4.10. Soil Carbon Accumulation By Vegetation Type

4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

4.10.2. Above and Belowground Carbon Accumulation by Land Use Type - Unmitigated

4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

4.10.4. Soil Carbon Accumulation By Vegetation Type - Mitigated

4.10.5. Above and Belowground Carbon Accumulation by Land Use Type - Mitigated

4.10.6. Avoided and Sequestered Emissions by Species - Mitigated

5. Activity Data

5.1. Construction Schedule

5.2. Off-Road Equipment

5.2.1. Unmitigated

5.2.2. Mitigated

5.3. Construction Vehicles

5.3.1. Unmitigated

5.3.2. Mitigated

5.4. Vehicles

5.4.1. Construction Vehicle Control Strategies

5.5. Architectural Coatings

5.6. Dust Mitigation

5.6.1. Construction Earthmoving Activities

5.6.2. Construction Earthmoving Control Strategies

5.7. Construction Paving

5.8. Construction Electricity Consumption and Emissions Factors

5.9. Operational Mobile Sources

5.9.1. Unmitigated

5.9.2. Mitigated

5.10. Operational Area Sources

5.10.1. Hearths

5.10.2. Architectural Coatings

5.10.3. Landscape Equipment

5.10.4. Landscape Equipment - Mitigated

5.11. Operational Energy Consumption

5.11.1. Unmitigated

5.11.2. Mitigated

5.12. Operational Water and Wastewater Consumption

5.12.1. Unmitigated

5.12.2. Mitigated

5.13. Operational Waste Generation

5.13.1. Unmitigated

5.13.2. Mitigated

5.14. Operational Refrigeration and Air Conditioning Equipment

5.14.1. Unmitigated

5.14.2. Mitigated

5.15. Operational Off-Road Equipment

5.15.1. Unmitigated

5.15.2. Mitigated

5.16. Stationary Sources

5.16.1. Emergency Generators and Fire Pumps

5.16.2. Process Boilers

5.17. User Defined

5.18. Vegetation

5.18.1. Land Use Change

5.18.1.1. Unmitigated

5.18.1.2. Mitigated

5.18.1. Biomass Cover Type

5.18.1.1. Unmitigated

5.18.1.2. Mitigated

5.18.2. Sequestration

5.18.2.1. Unmitigated

5.18.2.2. Mitigated

6. Climate Risk Detailed Report

6.1. Climate Risk Summary

6.2. Initial Climate Risk Scores

6.3. Adjusted Climate Risk Scores

6.4. Climate Risk Reduction Measures

7. Health and Equity Details

7.1. CalEnviroScreen 4.0 Scores

7.2. Healthy Places Index Scores

7.3. Overall Health & Equity Scores

7.4. Health & Equity Measures

7.5. Evaluation Scorecard

7.6. Health & Equity Custom Measures

8. User Changes to Default Data

8.1. Justifications

1. Basic Project Information

1.1. Basic Project Information

Data Field	Value
Project Name	Betty Ford Center Expansion - Minor Modifications
Construction Start Date	6/1/2026
Operational Year	2028
Lead Agency	—
Land Use Scale	Project/site
Analysis Level for Defaults	County
Windspeed (m/s)	3.3
Precipitation (days)	0.80
Location	33.763213365306825, -116.39865888747937
County	Riverside-Salton Sea
City	Rancho Mirage
Air District	South Coast AQMD
Air Basin	Salton Sea
TAZ	5620
EDFZ	11
Electric Utility	Southern California Edison
Gas Utility	Southern California Gas
App Version	2022.1.1.35

1.2. Land Use Types

Land Use Subtype	Size	Unit	Lot Acreage	Building Area (sq ft)	Landscape Area (sq ft)	Special Landscape Area (sq ft)	Population	Description
Congregate Care (Assisted Living)	60	Dwelling Unit	3.8	44,470	—	0.00	60	—

Parking Lot	56	1000sqft	1.3	0.00	2,800	—	—	—

1.3. User-Selected Emission Reduction Measures by Emissions Sector

Sector	#	Measure Title
Construction	C-10-C	Water Unpaved Construction Roads

2. Emissions Summary

2.1. Construction Emissions Compared Against Thresholds

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Un/Mit.	ROG	NOx	CO	SO2	PM10T	PM2.5T	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—
Unmit.	6.6	5.3	20	0.04	1.00	0.25	4,339
Mit.	6.6	5.3	20	0.04	1.00	0.25	4,339
% Reduced	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—
Unmit.	6.6	5.4	19	0.04	3.6	1.6	5,292
Mit.	6.6	5.4	19	0.04	3.6	1.6	5,292
% Reduced	—	—	—	—	—	—	—
Average Daily (Max)	—	—	—	—	—	—	—
Unmit.	0.84	2.0	12	0.02	0.73	0.27	2,228
Mit.	0.84	2.0	12	0.02	0.73	0.27	2,228
% Reduced	—	—	—	—	—	—	—
Annual (Max)	—	—	—	—	—	—	—
Unmit.	0.15	0.36	2.2	< 0.005	0.13	0.05	369
Mit.	0.15	0.36	2.2	< 0.005	0.13	0.05	369
% Reduced	—	—	—	—	—	—	—

Exceeds (Daily Max)	—	—	—	—	—	—	—
Threshold	75	100	550	150	150	55	—
Unmit.	No	No	No	No	No	No	—
Mit.	No	No	No	No	No	No	—
Exceeds (Average Daily)	—	—	—	—	—	—	—
Threshold	75	100	550	150	150	55	—
Unmit.	No	No	No	No	No	No	—
Mit.	No	No	No	No	No	No	—

2.2. Construction Emissions by Year, Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Year	ROG	NOx	CO	SO2	PM10T	PM2.5T	CO2e
Daily - Summer (Max)	—	—	—	—	—	—	—
2026	0.44	5.3	20	0.04	1.00	0.25	4,339
2027	0.42	2.4	18	0.02	0.67	0.19	3,232
2028	6.6	0.68	1.6	< 0.005	0.12	0.03	256
Daily - Winter (Max)	—	—	—	—	—	—	—
2026	0.43	5.4	19	0.04	3.6	1.6	5,292
2027	0.39	2.4	16	0.02	0.67	0.19	3,139
2028	6.6	2.0	11	0.01	0.22	0.07	1,697
Average Daily	—	—	—	—	—	—	—
2026	0.18	2.0	8.0	0.02	0.73	0.27	1,888
2027	0.28	1.7	12	0.02	0.46	0.13	2,228
2028	0.84	0.27	1.3	< 0.005	0.04	0.01	194
Annual	—	—	—	—	—	—	—
2026	0.03	0.36	1.5	< 0.005	0.13	0.05	313
2027	0.05	0.31	2.2	< 0.005	0.08	0.02	369

2028	0.15	0.05	0.23	< 0.005	0.01	< 0.005	32

2.3. Construction Emissions by Year, Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Year	ROG	NOx	CO	SO2	PM10T	PM2.5T	CO2e
Daily - Summer (Max)	—	—	—	—	—	—	—
2026	0.44	5.3	20	0.04	1.00	0.25	4,339
2027	0.42	2.4	18	0.02	0.67	0.19	3,232
2028	6.6	0.68	1.6	< 0.005	0.12	0.03	256
Daily - Winter (Max)	—	—	—	—	—	—	—
2026	0.43	5.4	19	0.04	3.6	1.6	5,292
2027	0.39	2.4	16	0.02	0.67	0.19	3,139
2028	6.6	2.0	11	0.01	0.22	0.07	1,697
Average Daily	—	—	—	—	—	—	—
2026	0.18	2.0	8.0	0.02	0.73	0.27	1,888
2027	0.28	1.7	12	0.02	0.46	0.13	2,228
2028	0.84	0.27	1.3	< 0.005	0.04	0.01	194
Annual	—	—	—	—	—	—	—
2026	0.03	0.36	1.5	< 0.005	0.13	0.05	313
2027	0.05	0.31	2.2	< 0.005	0.08	0.02	369
2028	0.15	0.05	0.23	< 0.005	0.01	< 0.005	32

2.4. Operations Emissions Compared Against Thresholds

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Un/Mit.	ROG	NOx	CO	SO2	PM10T	PM2.5T	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—
Unmit.	7.7	6.4	56	0.13	11	2.9	14,855
Daily, Winter (Max)	—	—	—	—	—	—	—

Unmit.	6.2	6.8	37	0.12	11	2.9	13,415
Average Daily (Max)	—	—	—	—	—	—	—
Unmit.	6.6	5.7	43	0.12	11	2.8	12,979
Annual (Max)	—	—	—	—	—	—	—
Unmit.	1.2	1.0	7.9	0.02	2.0	0.51	2,149
Exceeds (Daily Max)	—	—	—	—	—	—	—
Threshold	55	55	550	150	150	55	—
Unmit.	No	No	No	No	No	No	—
Exceeds (Average Daily)	—	—	—	—	—	—	—
Threshold	55	55	550	150	150	55	—
Unmit.	No	No	No	No	No	No	—
Exceeds (Annual)	—	—	—	—	—	—	—
Threshold	—	—	—	—	—	—	3,000
Unmit.	—	—	—	—	—	—	No

2.5. Operations Emissions by Sector, Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Sector	ROG	NOx	CO	SO2	PM10T	PM2.5T	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—
Mobile	6.3	5.3	52	0.13	11	2.8	13,016
Area	1.4	0.88	3.8	0.01	0.07	0.07	1,084
Energy	0.01	0.20	0.08	< 0.005	0.02	0.02	619
Water	—	—	—	—	—	—	31
Waste	—	—	—	—	—	—	103
Refrig.	—	—	—	—	—	—	0.56
Total	7.7	6.4	56	0.13	11	2.9	14,855
Daily, Winter (Max)	—	—	—	—	—	—	—

Mobile	5.1	5.7	37	0.11	11	2.8	11,586
Area	1.1	0.85	0.36	0.01	0.07	0.07	1,075
Energy	0.01	0.20	0.08	< 0.005	0.02	0.02	619
Water	—	—	—	—	—	—	31
Waste	—	—	—	—	—	—	103
Refrig.	—	—	—	—	—	—	0.56
Total	6.2	6.8	37	0.12	11	2.9	13,415
Average Daily	—	—	—	—	—	—	—
Mobile	5.4	5.5	41	0.12	11	2.8	12,147
Area	1.2	0.07	1.7	< 0.005	0.01	0.01	78
Energy	0.01	0.20	0.08	< 0.005	0.02	0.02	619
Water	—	—	—	—	—	—	31
Waste	—	—	—	—	—	—	103
Refrig.	—	—	—	—	—	—	0.56
Total	6.6	5.7	43	0.12	11	2.8	12,979
Annual	—	—	—	—	—	—	—
Mobile	0.99	1.00	7.5	0.02	2.0	0.51	2,011
Area	0.22	0.01	0.31	< 0.005	< 0.005	< 0.005	13
Energy	< 0.005	0.04	0.02	< 0.005	< 0.005	< 0.005	103
Water	—	—	—	—	—	—	5.2
Waste	—	—	—	—	—	—	17
Refrig.	—	—	—	—	—	—	0.09
Total	1.2	1.0	7.9	0.02	2.0	0.51	2,149

2.6. Operations Emissions by Sector, Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Sector	ROG	NOx	CO	SO2	PM10T	PM2.5T	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—

Mobile	6.3	5.3	52	0.13	11	2.8	13,016
Area	1.4	0.88	3.8	0.01	0.07	0.07	1,084
Energy	0.01	0.20	0.08	< 0.005	0.02	0.02	619
Water	—	—	—	—	—	—	31
Waste	—	—	—	—	—	—	103
Refrig.	—	—	—	—	—	—	0.56
Total	7.7	6.4	56	0.13	11	2.9	14,855
Daily, Winter (Max)	—	—	—	—	—	—	—
Mobile	5.1	5.7	37	0.11	11	2.8	11,586
Area	1.1	0.85	0.36	0.01	0.07	0.07	1,075
Energy	0.01	0.20	0.08	< 0.005	0.02	0.02	619
Water	—	—	—	—	—	—	31
Waste	—	—	—	—	—	—	103
Refrig.	—	—	—	—	—	—	0.56
Total	6.2	6.8	37	0.12	11	2.9	13,415
Average Daily	—	—	—	—	—	—	—
Mobile	5.4	5.5	41	0.12	11	2.8	12,147
Area	1.2	0.07	1.7	< 0.005	0.01	0.01	78
Energy	0.01	0.20	0.08	< 0.005	0.02	0.02	619
Water	—	—	—	—	—	—	31
Waste	—	—	—	—	—	—	103
Refrig.	—	—	—	—	—	—	0.56
Total	6.6	5.7	43	0.12	11	2.8	12,979
Annual	—	—	—	—	—	—	—
Mobile	0.99	1.00	7.5	0.02	2.0	0.51	2,011
Area	0.22	0.01	0.31	< 0.005	< 0.005	< 0.005	13
Energy	< 0.005	0.04	0.02	< 0.005	< 0.005	< 0.005	103
Water	—	—	—	—	—	—	5.2

Waste	—	—	—	—	—	—	17
Refrig.	—	—	—	—	—	—	0.09
Total	1.2	1.0	7.9	0.02	2.0	0.51	2,149

3. Construction Emissions Details

3.1. Demolition (2026) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	ROG	NOx	CO	SO2	PM10T	PM2.5T	CO2e
Onsite	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—
Off-Road Equipment	0.36	4.5	18	0.03	0.06	0.06	3,438
Demolition	—	—	—	—	0.55	0.08	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—
Off-Road Equipment	0.36	4.5	18	0.03	0.06	0.06	3,438
Demolition	—	—	—	—	0.55	0.08	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—
Off-Road Equipment	0.09	1.1	4.5	0.01	0.02	0.02	848
Demolition	—	—	—	—	0.14	0.02	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—
Off-Road Equipment	0.02	0.20	0.82	< 0.005	< 0.005	< 0.005	140
Demolition	—	—	—	—	0.02	< 0.005	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—

Worker	0.07	0.07	1.3	0.00	0.20	0.05	221
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.01	0.72	0.17	< 0.005	0.19	0.06	680
Daily, Winter (Max)	—	—	—	—	—	—	—
Worker	0.06	0.08	0.75	0.00	0.20	0.05	188
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.01	0.77	0.17	< 0.005	0.19	0.06	679
Average Daily	—	—	—	—	—	—	—
Worker	0.01	0.02	0.23	0.00	0.05	0.01	50
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	< 0.005	0.19	0.04	< 0.005	0.05	0.01	168
Annual	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.04	0.00	0.01	< 0.005	8.2
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	< 0.005	0.03	0.01	< 0.005	0.01	< 0.005	28

3.2. Demolition (2026) - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	ROG	NOx	CO	SO2	PM10T	PM2.5T	CO2e
Onsite	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—
Off-Road Equipment	0.36	4.5	18	0.03	0.06	0.06	3,438
Demolition	—	—	—	—	0.55	0.08	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—
Off-Road Equipment	0.36	4.5	18	0.03	0.06	0.06	3,438
Demolition	—	—	—	—	0.55	0.08	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00

Average Daily	—	—	—	—	—	—	—
Off-Road Equipment	0.09	1.1	4.5	0.01	0.02	0.02	848
Demolition	—	—	—	—	0.14	0.02	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—
Off-Road Equipment	0.02	0.20	0.82	< 0.005	< 0.005	< 0.005	140
Demolition	—	—	—	—	0.02	< 0.005	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—
Worker	0.07	0.07	1.3	0.00	0.20	0.05	221
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.01	0.72	0.17	< 0.005	0.19	0.06	680
Daily, Winter (Max)	—	—	—	—	—	—	—
Worker	0.06	0.08	0.75	0.00	0.20	0.05	188
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.01	0.77	0.17	< 0.005	0.19	0.06	679
Average Daily	—	—	—	—	—	—	—
Worker	0.01	0.02	0.23	0.00	0.05	0.01	50
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	< 0.005	0.19	0.04	< 0.005	0.05	0.01	168
Annual	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.04	0.00	0.01	< 0.005	8.2
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	< 0.005	0.03	0.01	< 0.005	0.01	< 0.005	28

3.3. Grading (2026) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	ROG	NOx	CO	SO2	PM10T	PM2.5T	CO2e
Onsite	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—
Off-Road Equipment	0.29	2.0	18	0.03	0.06	0.06	2,970
Dust From Material Movement	—	—	—	—	2.8	1.3	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—
Off-Road Equipment	0.04	0.25	2.2	< 0.005	0.01	0.01	366
Dust From Material Movement	—	—	—	—	0.34	0.16	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.05	0.40	< 0.005	< 0.005	< 0.005	61
Dust From Material Movement	—	—	—	—	0.06	0.03	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—
Worker	0.06	0.08	0.75	0.00	0.20	0.05	188
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.04	2.4	0.54	0.01	0.59	0.18	2,134
Average Daily	—	—	—	—	—	—	—
Worker	0.01	0.01	0.12	0.00	0.02	0.01	25
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.01	0.29	0.07	< 0.005	0.07	0.02	263
Annual	—	—	—	—	—	—	—

Worker	< 0.005	< 0.005	0.02	0.00	< 0.005	< 0.005	4.1
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	< 0.005	0.05	0.01	< 0.005	0.01	< 0.005	44

3.4. Grading (2026) - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	ROG	NOx	CO	SO2	PM10T	PM2.5T	CO2e
Onsite	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—
Off-Road Equipment	0.29	2.0	18	0.03	0.06	0.06	2,970
Dust From Material Movement	—	—	—	—	2.8	1.3	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—
Off-Road Equipment	0.04	0.25	2.2	< 0.005	0.01	0.01	366
Dust From Material Movement	—	—	—	—	0.34	0.16	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.05	0.40	< 0.005	< 0.005	< 0.005	61
Dust From Material Movement	—	—	—	—	0.06	0.03	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—
Worker	0.06	0.08	0.75	0.00	0.20	0.05	188
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00

Hauling	0.04	2.4	0.54	0.01	0.59	0.18	2,134
Average Daily	—	—	—	—	—	—	—
Worker	0.01	0.01	0.12	0.00	0.02	0.01	25
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.01	0.29	0.07	< 0.005	0.07	0.02	263
Annual	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.02	0.00	< 0.005	< 0.005	4.1
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	< 0.005	0.05	0.01	< 0.005	0.01	< 0.005	44

3.5. Building Construction (2026) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	ROG	NOx	CO	SO2	PM10T	PM2.5T	CO2e
Onsite	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—
Off-Road Equipment	0.23	2.0	14	0.02	0.04	0.04	2,405
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.11	0.76	< 0.005	< 0.005	< 0.005	127
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	0.02	0.14	< 0.005	< 0.005	< 0.005	21
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—
Worker	0.16	0.22	2.2	0.00	0.56	0.13	541

Vendor	0.01	0.22	0.09	< 0.005	0.06	0.02	208
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—
Worker	0.01	0.01	0.14	0.00	0.03	0.01	31
Vendor	< 0.005	0.01	< 0.005	< 0.005	< 0.005	< 0.005	11
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.03	0.00	0.01	< 0.005	5.1
Vendor	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	1.8
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00

3.6. Building Construction (2026) - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	ROG	NOx	CO	SO2	PM10T	PM2.5T	CO2e
Onsite	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—
Off-Road Equipment	0.23	2.0	14	0.02	0.04	0.04	2,405
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.11	0.76	< 0.005	< 0.005	< 0.005	127
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	0.02	0.14	< 0.005	< 0.005	< 0.005	21
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—

Worker	0.16	0.22	2.2	0.00	0.56	0.13	541
Vendor	0.01	0.22	0.09	< 0.005	0.06	0.02	208
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—
Worker	0.01	0.01	0.14	0.00	0.03	0.01	31
Vendor	< 0.005	0.01	< 0.005	< 0.005	< 0.005	< 0.005	11
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.03	0.00	0.01	< 0.005	5.1
Vendor	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	1.8
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00

3.7. Building Construction (2027) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	ROG	NOx	CO	SO2	PM10T	PM2.5T	CO2e
Onsite	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—
Off-Road Equipment	0.23	2.0	14	0.02	0.04	0.04	2,405
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—
Off-Road Equipment	0.23	2.0	14	0.02	0.04	0.04	2,405
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—
Off-Road Equipment	0.16	1.4	9.8	0.02	0.03	0.03	1,652
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—
Off-Road Equipment	0.03	0.25	1.8	< 0.005	0.01	0.01	274
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00

Offsite	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—
Worker	0.19	0.19	3.6	0.00	0.56	0.13	624
Vendor	0.01	0.20	0.09	< 0.005	0.06	0.02	203
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—
Worker	0.15	0.20	2.0	0.00	0.56	0.13	531
Vendor	0.01	0.21	0.09	< 0.005	0.06	0.02	203
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—
Worker	0.11	0.13	1.7	0.00	0.39	0.09	390
Vendor	< 0.005	0.14	0.06	< 0.005	0.04	0.01	139
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—
Worker	0.02	0.02	0.32	0.00	0.07	0.02	65
Vendor	< 0.005	0.03	0.01	< 0.005	0.01	< 0.005	23
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00

3.8. Building Construction (2027) - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	ROG	NOx	CO	SO2	PM10T	PM2.5T	CO2e
Onsite	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—
Off-Road Equipment	0.23	2.0	14	0.02	0.04	0.04	2,405
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—
Off-Road Equipment	0.23	2.0	14	0.02	0.04	0.04	2,405
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00

Average Daily	—	—	—	—	—	—	—
Off-Road Equipment	0.16	1.4	9.8	0.02	0.03	0.03	1,652
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—
Off-Road Equipment	0.03	0.25	1.8	< 0.005	0.01	0.01	274
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—
Worker	0.19	0.19	3.6	0.00	0.56	0.13	624
Vendor	0.01	0.20	0.09	< 0.005	0.06	0.02	203
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—
Worker	0.15	0.20	2.0	0.00	0.56	0.13	531
Vendor	0.01	0.21	0.09	< 0.005	0.06	0.02	203
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—
Worker	0.11	0.13	1.7	0.00	0.39	0.09	390
Vendor	< 0.005	0.14	0.06	< 0.005	0.04	0.01	139
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—
Worker	0.02	0.02	0.32	0.00	0.07	0.02	65
Vendor	< 0.005	0.03	0.01	< 0.005	0.01	< 0.005	23
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00

3.9. Paving (2027) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	ROG	NOx	CO	SO2	PM10T	PM2.5T	CO2e
Onsite	—	—	—	—	—	—	—

Daily, Summer (Max)	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—
Off-Road Equipment	0.16	1.9	11	0.01	0.03	0.03	1,516
Paving	0.07	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	0.05	0.29	< 0.005	< 0.005	< 0.005	42
Paving	< 0.005	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	0.01	0.05	< 0.005	< 0.005	< 0.005	6.9
Paving	< 0.005	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—
Worker	0.05	0.07	0.70	0.00	0.20	0.05	184
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.02	0.00	0.01	< 0.005	5.4
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.00	< 0.005	< 0.005	0.89
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00

3.10. Paving (2027) - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	ROG	NOx	CO	SO2	PM10T	PM2.5T	CO2e
Onsite	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—
Off-Road Equipment	0.16	1.9	11	0.01	0.03	0.03	1,516
Paving	0.07	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	0.05	0.29	< 0.005	< 0.005	< 0.005	42
Paving	< 0.005	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	0.01	0.05	< 0.005	< 0.005	< 0.005	6.9
Paving	< 0.005	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—
Worker	0.05	0.07	0.70	0.00	0.20	0.05	184
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.02	0.00	0.01	< 0.005	5.4
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—

Worker	< 0.005	< 0.005	< 0.005	0.00	< 0.005	< 0.005	0.89
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00

3.11. Paving (2028) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	ROG	NOx	CO	SO2	PM10T	PM2.5T	CO2e
Onsite	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—
Off-Road Equipment	0.16	1.9	11	0.01	0.03	0.03	1,516
Paving	0.07	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—
Off-Road Equipment	0.02	0.19	1.0	< 0.005	< 0.005	< 0.005	145
Paving	0.01	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	0.03	0.19	< 0.005	< 0.005	< 0.005	24
Paving	< 0.005	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—
Worker	0.05	0.06	0.65	0.00	0.20	0.05	181
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—

Worker	0.01	0.01	0.08	0.00	0.02	< 0.005	19
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.01	0.00	< 0.005	< 0.005	3.1
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00

3.12. Paving (2028) - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	ROG	NOx	CO	SO2	PM10T	PM2.5T	CO2e
Onsite	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—
Off-Road Equipment	0.16	1.9	11	0.01	0.03	0.03	1,516
Paving	0.07	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—
Off-Road Equipment	0.02	0.19	1.0	< 0.005	< 0.005	< 0.005	145
Paving	0.01	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	0.03	0.19	< 0.005	< 0.005	< 0.005	24
Paving	< 0.005	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—

Worker	0.05	0.06	0.65	0.00	0.20	0.05	181
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—
Worker	0.01	0.01	0.08	0.00	0.02	< 0.005	19
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.01	0.00	< 0.005	< 0.005	3.1
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00

3.13. Architectural Coating (2028) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	ROG	NOx	CO	SO2	PM10T	PM2.5T	CO2e
Onsite	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—
Off-Road Equipment	0.02	0.65	0.96	< 0.005	< 0.005	< 0.005	134
Architectural Coatings	6.5	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—
Off-Road Equipment	0.02	0.65	0.96	< 0.005	< 0.005	< 0.005	134
Architectural Coatings	6.5	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	0.08	0.12	< 0.005	< 0.005	< 0.005	17
Architectural Coatings	0.81	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00

Annual	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	0.01	0.02	< 0.005	< 0.005	< 0.005	2.7
Architectural Coatings	0.15	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—
Worker	0.04	0.03	0.67	0.00	0.11	0.03	122
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—
Worker	0.03	0.04	0.37	0.00	0.11	0.03	104
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.06	0.00	0.01	< 0.005	14
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.01	0.00	< 0.005	< 0.005	2.3
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00

3.14. Architectural Coating (2028) - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	ROG	NOx	CO	SO2	PM10T	PM2.5T	CO2e
Onsite	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—
Off-Road Equipment	0.02	0.65	0.96	< 0.005	< 0.005	< 0.005	134

Architectural Coatings	6.5	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—
Off-Road Equipment	0.02	0.65	0.96	< 0.005	< 0.005	< 0.005	134
Architectural Coatings	6.5	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	0.08	0.12	< 0.005	< 0.005	< 0.005	17
Architectural Coatings	0.81	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	0.01	0.02	< 0.005	< 0.005	< 0.005	2.7
Architectural Coatings	0.15	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—
Worker	0.04	0.03	0.67	0.00	0.11	0.03	122
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—
Worker	0.03	0.04	0.37	0.00	0.11	0.03	104
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.06	0.00	0.01	< 0.005	14
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—

Worker	< 0.005	< 0.005	0.01	0.00	< 0.005	< 0.005	2.3
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00

4. Operations Emissions Details

4.1. Mobile Emissions by Land Use

4.1.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	ROG	NOx	CO	SO2	PM10T	PM2.5T	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—
Congregate Care (Assisted Living)	6.3	5.3	52	0.13	11	2.8	13,016
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total	6.3	5.3	52	0.13	11	2.8	13,016
Daily, Winter (Max)	—	—	—	—	—	—	—
Congregate Care (Assisted Living)	5.1	5.7	37	0.11	11	2.8	11,586
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total	5.1	5.7	37	0.11	11	2.8	11,586
Annual	—	—	—	—	—	—	—
Congregate Care (Assisted Living)	0.99	1.00	7.5	0.02	2.0	0.51	2,011
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total	0.99	1.00	7.5	0.02	2.0	0.51	2,011

4.1.2. Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	ROG	NOx	CO	SO2	PM10T	PM2.5T	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—
Congregate Care (Assisted Living)	6.3	5.3	52	0.13	11	2.8	13,016
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total	6.3	5.3	52	0.13	11	2.8	13,016
Daily, Winter (Max)	—	—	—	—	—	—	—
Congregate Care (Assisted Living)	5.1	5.7	37	0.11	11	2.8	11,586
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total	5.1	5.7	37	0.11	11	2.8	11,586
Annual	—	—	—	—	—	—	—
Congregate Care (Assisted Living)	0.99	1.00	7.5	0.02	2.0	0.51	2,011
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total	0.99	1.00	7.5	0.02	2.0	0.51	2,011

4.2. Energy

4.2.1. Electricity Emissions By Land Use - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	ROG	NOx	CO	SO2	PM10T	PM2.5T	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—
Congregate Care (Assisted Living)	—	—	—	—	—	—	324
Parking Lot	—	—	—	—	—	—	47
Total	—	—	—	—	—	—	371
Daily, Winter (Max)	—	—	—	—	—	—	—
Congregate Care (Assisted Living)	—	—	—	—	—	—	324

Parking Lot	—	—	—	—	—	—	47
Total	—	—	—	—	—	—	371
Annual	—	—	—	—	—	—	—
Congregate Care (Assisted Living)	—	—	—	—	—	—	54
Parking Lot	—	—	—	—	—	—	7.7
Total	—	—	—	—	—	—	61

4.2.2. Electricity Emissions By Land Use - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	ROG	NOx	CO	SO2	PM10T	PM2.5T	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—
Congregate Care (Assisted Living)	—	—	—	—	—	—	324
Parking Lot	—	—	—	—	—	—	47
Total	—	—	—	—	—	—	371
Daily, Winter (Max)	—	—	—	—	—	—	—
Congregate Care (Assisted Living)	—	—	—	—	—	—	324
Parking Lot	—	—	—	—	—	—	47
Total	—	—	—	—	—	—	371
Annual	—	—	—	—	—	—	—
Congregate Care (Assisted Living)	—	—	—	—	—	—	54
Parking Lot	—	—	—	—	—	—	7.7
Total	—	—	—	—	—	—	61

4.2.3. Natural Gas Emissions By Land Use - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	ROG	NOx	CO	SO2	PM10T	PM2.5T	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—
Congregate Care (Assisted Living)	0.01	0.20	0.08	< 0.005	0.02	0.02	249
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total	0.01	0.20	0.08	< 0.005	0.02	0.02	249
Daily, Winter (Max)	—	—	—	—	—	—	—
Congregate Care (Assisted Living)	0.01	0.20	0.08	< 0.005	0.02	0.02	249
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total	0.01	0.20	0.08	< 0.005	0.02	0.02	249
Annual	—	—	—	—	—	—	—
Congregate Care (Assisted Living)	< 0.005	0.04	0.02	< 0.005	< 0.005	< 0.005	41
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total	< 0.005	0.04	0.02	< 0.005	< 0.005	< 0.005	41

4.2.4. Natural Gas Emissions By Land Use - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	ROG	NOx	CO	SO2	PM10T	PM2.5T	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—
Congregate Care (Assisted Living)	0.01	0.20	0.08	< 0.005	0.02	0.02	249
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total	0.01	0.20	0.08	< 0.005	0.02	0.02	249
Daily, Winter (Max)	—	—	—	—	—	—	—
Congregate Care (Assisted Living)	0.01	0.20	0.08	< 0.005	0.02	0.02	249
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total	0.01	0.20	0.08	< 0.005	0.02	0.02	249

Annual	—	—	—	—	—	—	—
Congregate Care (Assisted Living)	< 0.005	0.04	0.02	< 0.005	< 0.005	< 0.005	41
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total	< 0.005	0.04	0.02	< 0.005	< 0.005	< 0.005	41

4.3. Area Emissions by Source

4.3.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Source	ROG	NOx	CO	SO2	PM10T	PM2.5T	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—
Hearths	0.05	0.85	0.36	0.01	0.07	0.07	1,075
Consumer Products	0.96	—	—	—	—	—	—
Architectural Coatings	0.08	—	—	—	—	—	—
Landscape Equipment	0.30	0.03	3.4	< 0.005	< 0.005	< 0.005	9.1
Total	1.4	0.88	3.8	0.01	0.07	0.07	1,084
Daily, Winter (Max)	—	—	—	—	—	—	—
Hearths	0.05	0.85	0.36	0.01	0.07	0.07	1,075
Consumer Products	0.96	—	—	—	—	—	—
Architectural Coatings	0.08	—	—	—	—	—	—
Total	1.1	0.85	0.36	0.01	0.07	0.07	1,075
Annual	—	—	—	—	—	—	—
Hearths	< 0.005	0.01	< 0.005	< 0.005	< 0.005	< 0.005	12
Consumer Products	0.17	—	—	—	—	—	—
Architectural Coatings	0.01	—	—	—	—	—	—
Landscape Equipment	0.03	< 0.005	0.31	< 0.005	< 0.005	< 0.005	0.75
Total	0.22	0.01	0.31	< 0.005	< 0.005	< 0.005	13

4.3.2. Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Source	ROG	NOx	CO	SO2	PM10T	PM2.5T	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—
Hearths	0.05	0.85	0.36	0.01	0.07	0.07	1,075
Consumer Products	0.96	—	—	—	—	—	—
Architectural Coatings	0.08	—	—	—	—	—	—
Landscape Equipment	0.30	0.03	3.4	< 0.005	< 0.005	< 0.005	9.1
Total	1.4	0.88	3.8	0.01	0.07	0.07	1,084
Daily, Winter (Max)	—	—	—	—	—	—	—
Hearths	0.05	0.85	0.36	0.01	0.07	0.07	1,075
Consumer Products	0.96	—	—	—	—	—	—
Architectural Coatings	0.08	—	—	—	—	—	—
Total	1.1	0.85	0.36	0.01	0.07	0.07	1,075
Annual	—	—	—	—	—	—	—
Hearths	< 0.005	0.01	< 0.005	< 0.005	< 0.005	< 0.005	12
Consumer Products	0.17	—	—	—	—	—	—
Architectural Coatings	0.01	—	—	—	—	—	—
Landscape Equipment	0.03	< 0.005	0.31	< 0.005	< 0.005	< 0.005	0.75
Total	0.22	0.01	0.31	< 0.005	< 0.005	< 0.005	13

4.4. Water Emissions by Land Use

4.4.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	ROG	NOx	CO	SO2	PM10T	PM2.5T	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—

Congregate Care (Assisted Living)	—	—	—	—	—	—	31
Parking Lot	—	—	—	—	—	—	0.16
Total	—	—	—	—	—	—	31
Daily, Winter (Max)	—	—	—	—	—	—	—
Congregate Care (Assisted Living)	—	—	—	—	—	—	31
Parking Lot	—	—	—	—	—	—	0.16
Total	—	—	—	—	—	—	31
Annual	—	—	—	—	—	—	—
Congregate Care (Assisted Living)	—	—	—	—	—	—	5.1
Parking Lot	—	—	—	—	—	—	0.03
Total	—	—	—	—	—	—	5.2

4.4.2. Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	ROG	NOx	CO	SO2	PM10T	PM2.5T	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—
Congregate Care (Assisted Living)	—	—	—	—	—	—	31
Parking Lot	—	—	—	—	—	—	0.16
Total	—	—	—	—	—	—	31
Daily, Winter (Max)	—	—	—	—	—	—	—
Congregate Care (Assisted Living)	—	—	—	—	—	—	31
Parking Lot	—	—	—	—	—	—	0.16
Total	—	—	—	—	—	—	31
Annual	—	—	—	—	—	—	—

Congregate Care (Assisted Living)	—	—	—	—	—	—	5.1
Parking Lot	—	—	—	—	—	—	0.03
Total	—	—	—	—	—	—	5.2

4.5. Waste Emissions by Land Use

4.5.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	ROG	NOx	CO	SO2	PM10T	PM2.5T	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—
Congregate Care (Assisted Living)	—	—	—	—	—	—	103
Parking Lot	—	—	—	—	—	—	0.00
Total	—	—	—	—	—	—	103
Daily, Winter (Max)	—	—	—	—	—	—	—
Congregate Care (Assisted Living)	—	—	—	—	—	—	103
Parking Lot	—	—	—	—	—	—	0.00
Total	—	—	—	—	—	—	103
Annual	—	—	—	—	—	—	—
Congregate Care (Assisted Living)	—	—	—	—	—	—	17
Parking Lot	—	—	—	—	—	—	0.00
Total	—	—	—	—	—	—	17

4.5.2. Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	ROG	NOx	CO	SO2	PM10T	PM2.5T	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—

Congregate Care (Assisted Living)	—	—	—	—	—	—	103
Parking Lot	—	—	—	—	—	—	0.00
Total	—	—	—	—	—	—	103
Daily, Winter (Max)	—	—	—	—	—	—	—
Congregate Care (Assisted Living)	—	—	—	—	—	—	103
Parking Lot	—	—	—	—	—	—	0.00
Total	—	—	—	—	—	—	103
Annual	—	—	—	—	—	—	—
Congregate Care (Assisted Living)	—	—	—	—	—	—	17
Parking Lot	—	—	—	—	—	—	0.00
Total	—	—	—	—	—	—	17

4.6. Refrigerant Emissions by Land Use

4.6.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	ROG	NOx	CO	SO2	PM10T	PM2.5T	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—
Congregate Care (Assisted Living)	—	—	—	—	—	—	0.56
Total	—	—	—	—	—	—	0.56
Daily, Winter (Max)	—	—	—	—	—	—	—
Congregate Care (Assisted Living)	—	—	—	—	—	—	0.56
Total	—	—	—	—	—	—	0.56
Annual	—	—	—	—	—	—	—
Congregate Care (Assisted Living)	—	—	—	—	—	—	0.09

Total	—	—	—	—	—	—	0.09

4.6.2. Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	ROG	NOx	CO	SO2	PM10T	PM2.5T	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—
Congregate Care (Assisted Living)	—	—	—	—	—	—	0.56
Total	—	—	—	—	—	—	0.56
Daily, Winter (Max)	—	—	—	—	—	—	—
Congregate Care (Assisted Living)	—	—	—	—	—	—	0.56
Total	—	—	—	—	—	—	0.56
Annual	—	—	—	—	—	—	—
Congregate Care (Assisted Living)	—	—	—	—	—	—	0.09
Total	—	—	—	—	—	—	0.09

4.7. Offroad Emissions By Equipment Type

4.7.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	ROG	NOx	CO	SO2	PM10T	PM2.5T	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—

4.7.2. Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	ROG	NOx	CO	SO2	PM10T	PM2.5T	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—

4.8. Stationary Emissions By Equipment Type

4.8.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	ROG	NOx	CO	SO2	PM10T	PM2.5T	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—

4.8.2. Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	ROG	NOx	CO	SO2	PM10T	PM2.5T	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—

Total	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—

4.9. User Defined Emissions By Equipment Type

4.9.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	ROG	NOx	CO	SO2	PM10T	PM2.5T	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—

4.9.2. Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	ROG	NOx	CO	SO2	PM10T	PM2.5T	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—

4.10. Soil Carbon Accumulation By Vegetation Type

4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Vegetation	ROG	NOx	CO	SO2	PM10T	PM2.5T	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—

4.10.2. Above and Belowground Carbon Accumulation by Land Use Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	ROG	NOx	CO	SO2	PM10T	PM2.5T	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—

4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Species	ROG	NOx	CO	SO2	PM10T	PM2.5T	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—

Subtotal	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—

4.10.4. Soil Carbon Accumulation By Vegetation Type - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Vegetation	ROG	NOx	CO	SO2	PM10T	PM2.5T	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—

Annual	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—

4.10.5. Above and Belowground Carbon Accumulation by Land Use Type - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	ROG	NOx	CO	SO2	PM10T	PM2.5T	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—

4.10.6. Avoided and Sequestered Emissions by Species - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Species	ROG	NOx	CO	SO2	PM10T	PM2.5T	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—

Subtotal	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—

5. Activity Data

5.1. Construction Schedule

Phase Name	Phase Type	Start Date	End Date	Days Per Week	Work Days per Phase	Phase Description
Demolition	Demolition	6/1/2026	10/2/2026	5.0	90	—
Grading	Grading	10/3/2026	12/4/2026	5.0	45	—
Building Construction	Building Construction	12/5/2026	12/17/2027	5.0	270	—
Paving	Paving	12/18/2027	2/18/2028	5.0	45	—
Architectural Coating	Architectural Coating	2/19/2028	4/21/2028	5.0	45	—

5.2. Off-Road Equipment

5.2.1. Unmitigated

Phase Name	Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor

Demolition	Concrete/Industrial Saws	Diesel	Tier 4 Final	1.00	8.0	33	0.73
Demolition	Excavators	Diesel	Tier 4 Final	3.0	8.0	36	0.38
Demolition	Rubber Tired Dozers	Diesel	Tier 4 Final	2.0	8.0	367	0.40
Grading	Excavators	Diesel	Tier 4 Final	1.00	8.0	36	0.38
Grading	Graders	Diesel	Tier 4 Final	1.00	8.0	148	0.41
Grading	Rubber Tired Dozers	Diesel	Tier 4 Final	1.00	8.0	367	0.40
Grading	Tractors/Loaders/Backhoes	Diesel	Tier 4 Final	3.0	8.0	84	0.37
Building Construction	Cranes	Diesel	Tier 4 Final	1.00	7.0	367	0.29
Building Construction	Forklifts	Diesel	Tier 4 Final	3.0	8.0	82	0.20
Building Construction	Generator Sets	Diesel	Tier 4 Final	1.00	8.0	14	0.74
Building Construction	Tractors/Loaders/Backhoes	Diesel	Tier 4 Final	3.0	7.0	84	0.37
Building Construction	Welders	Diesel	Tier 4 Final	1.00	8.0	46	0.45
Paving	Pavers	Diesel	Tier 4 Final	2.0	8.0	81	0.42
Paving	Paving Equipment	Diesel	Tier 4 Final	2.0	8.0	89	0.36
Paving	Rollers	Diesel	Tier 4 Final	2.0	8.0	36	0.38
Architectural Coating	Air Compressors	Diesel	Tier 4 Final	1.00	6.0	37	0.48

5.2.2. Mitigated

Phase Name	Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
Demolition	Concrete/Industrial Saws	Diesel	Tier 4 Final	1.00	8.0	33	0.73
Demolition	Excavators	Diesel	Tier 4 Final	3.0	8.0	36	0.38
Demolition	Rubber Tired Dozers	Diesel	Tier 4 Final	2.0	8.0	367	0.40
Grading	Excavators	Diesel	Tier 4 Final	1.00	8.0	36	0.38
Grading	Graders	Diesel	Tier 4 Final	1.00	8.0	148	0.41
Grading	Rubber Tired Dozers	Diesel	Tier 4 Final	1.00	8.0	367	0.40

Grading	Tractors/Loaders/Back	Diesel	Tier 4 Final	3.0	8.0	84	0.37
Building Construction	Cranes	Diesel	Tier 4 Final	1.00	7.0	367	0.29
Building Construction	Forklifts	Diesel	Tier 4 Final	3.0	8.0	82	0.20
Building Construction	Generator Sets	Diesel	Tier 4 Final	1.00	8.0	14	0.74
Building Construction	Tractors/Loaders/Back hoes	Diesel	Tier 4 Final	3.0	7.0	84	0.37
Building Construction	Welders	Diesel	Tier 4 Final	1.00	8.0	46	0.45
Paving	Pavers	Diesel	Tier 4 Final	2.0	8.0	81	0.42
Paving	Paving Equipment	Diesel	Tier 4 Final	2.0	8.0	89	0.36
Paving	Rollers	Diesel	Tier 4 Final	2.0	8.0	36	0.38
Architectural Coating	Air Compressors	Diesel	Tier 4 Final	1.00	6.0	37	0.48

5.3. Construction Vehicles

5.3.1. Unmitigated

Phase Name	Trip Type	One-Way Trips per Day	Miles per Trip	Vehicle Mix
Demolition	Worker	15	19	LDA,LDT1,LDT2
Demolition	Vendor	—	10	HHDT,MHDT
Demolition	Hauling	9.7	20	HHDT
Demolition	Onsite truck	—	—	HHDT
Grading	Worker	15	19	LDA,LDT1,LDT2
Grading	Vendor	—	10	HHDT,MHDT
Grading	Hauling	31	20	HHDT
Grading	Onsite truck	—	—	HHDT
Building Construction	Worker	43	19	LDA,LDT1,LDT2
Building Construction	Vendor	6.4	10	HHDT,MHDT
Building Construction	Hauling	0.00	20	HHDT
Building Construction	Onsite truck	—	—	HHDT
Paving	Worker	15	19	LDA,LDT1,LDT2

Paving	Vendor	—	10	HHDT,MHDT
Paving	Hauling	0.00	20	HHDT
Paving	Onsite truck	—	—	HHDT
Architectural Coating	Worker	8.6	19	LDA,LDT1,LDT2
Architectural Coating	Vendor	—	10	HHDT,MHDT
Architectural Coating	Hauling	0.00	20	HHDT
Architectural Coating	Onsite truck	—	—	HHDT

5.3.2. Mitigated

Phase Name	Trip Type	One-Way Trips per Day	Miles per Trip	Vehicle Mix
Demolition	Worker	15	19	LDA,LDT1,LDT2
Demolition	Vendor	—	10	HHDT,MHDT
Demolition	Hauling	9.7	20	HHDT
Demolition	Onsite truck	—	—	HHDT
Grading	Worker	15	19	LDA,LDT1,LDT2
Grading	Vendor	—	10	HHDT,MHDT
Grading	Hauling	31	20	HHDT
Grading	Onsite truck	—	—	HHDT
Building Construction	Worker	43	19	LDA,LDT1,LDT2
Building Construction	Vendor	6.4	10	HHDT,MHDT
Building Construction	Hauling	0.00	20	HHDT
Building Construction	Onsite truck	—	—	HHDT
Paving	Worker	15	19	LDA,LDT1,LDT2
Paving	Vendor	—	10	HHDT,MHDT
Paving	Hauling	0.00	20	HHDT
Paving	Onsite truck	—	—	HHDT
Architectural Coating	Worker	8.6	19	LDA,LDT1,LDT2
Architectural Coating	Vendor	—	10	HHDT,MHDT

Architectural Coating	Hauling	0.00	20	HHDT
Architectural Coating	Onsite truck	—	—	HHDT

5.4. Vehicles

5.4.1. Construction Vehicle Control Strategies

Non-applicable. No control strategies activated by user.

5.5. Architectural Coatings

Phase Name	Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
Architectural Coating	90,052	30,017	0.00	0.00	3,360

5.6. Dust Mitigation

5.6.1. Construction Earthmoving Activities

Phase Name	Material Imported (Cubic Yards)	Material Exported (Cubic Yards)	Acres Graded (acres)	Material Demolished (Ton of Debris)	Acres Paved (acres)
Demolition	0.00	0.00	0.00	3,500	0.00
Grading	11,000	0.00	35	0.00	0.00
Paving	0.00	0.00	0.00	0.00	1.3

5.6.2. Construction Earthmoving Control Strategies

Control Strategies Applied	Frequency (per day)	PM10 Reduction	PM2.5 Reduction
Water Exposed Area	2	61%	61%
Water Demolished Area	2	36%	36%

5.7. Construction Paving

Phase Name	Land Use	Area Paved (acres)	% Asphalt

Paving	Congregate Care (Assisted Living)	—	0%
Paving	Parking Lot	1.3	95%

5.8. Construction Electricity Consumption and Emissions Factors

kWh per Year and Emission Factor (lb/MWh)

Year	kWh per Year	CO2	CH4	N2O
2026	0.00	346	0.03	< 0.005
2027	0.00	346	0.03	< 0.005
2028	0.00	346	0.03	< 0.005

5.9. Operational Mobile Sources

5.9.1. Unmitigated

Land Use Type	Trips/Weekday	Trips/Saturday	Trips/Sunday	Trips/Year	VMT/Weekday	VMT/Saturday	VMT/Sunday	VMT/Year
Congregate Care (Assisted Living)	1,860	1,860	1,860	678,900	15,054	15,054	15,054	5,494,783
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

5.9.2. Mitigated

Land Use Type	Trips/Weekday	Trips/Saturday	Trips/Sunday	Trips/Year	VMT/Weekday	VMT/Saturday	VMT/Sunday	VMT/Year
Congregate Care (Assisted Living)	1,860	1,860	1,860	678,900	15,054	15,054	15,054	5,494,783
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

5.10. Operational Area Sources

5.10.1. Hearths

Land Use	Hearth Type	Unmitigated (number)	Mitigated (number)

Congregate Care (Assisted Living)	Wood Fireplaces	3	3
Congregate Care (Assisted Living)	Gas Fireplaces	51	51
Congregate Care (Assisted Living)	Propane Fireplaces	0	0
Congregate Care (Assisted Living)	Electric Fireplaces	0	0
Congregate Care (Assisted Living)	No Fireplaces	6	6
Congregate Care (Assisted Living)	Conventional Wood Stoves	0	0
Congregate Care (Assisted Living)	Catalytic Wood Stoves	3	3
Congregate Care (Assisted Living)	Non-Catalytic Wood Stoves	3	3
Congregate Care (Assisted Living)	Pellet Wood Stoves	0	0
Parking Lot	Wood Fireplaces	0	0
Parking Lot	Gas Fireplaces	0	0
Parking Lot	Propane Fireplaces	0	0
Parking Lot	Electric Fireplaces	0	0
Parking Lot	No Fireplaces	0	0
Parking Lot	Conventional Wood Stoves	0	0
Parking Lot	Catalytic Wood Stoves	0	0
Parking Lot	Non-Catalytic Wood Stoves	0	0
Parking Lot	Pellet Wood Stoves	0	0

5.10.2. Architectural Coatings

—	Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
undefined	90,052	30,017	0.00	0.00	3,360

5.10.3. Landscape Equipment

Season	Unit	Value
Snow Days	day/yr	0.00
Summer Days	day/yr	180

5.10.4. Landscape Equipment - Mitigated

Season	Unit	Value
Snow Days	day/yr	0.00
Summer Days	day/yr	180

5.11. Operational Energy Consumption

5.11.1. Unmitigated

Electricity (kWh/yr) and CO2 and CH4 and N2O and Natural Gas (kBTU/yr)

Land Use	Electricity (kWh/yr)	CO2	CH4	N2O	Natural Gas (kBTU/yr)
Congregate Care (Assisted Living)	339,550	346	0.0330	0.0040	773,569
Parking Lot	49,056	346	0.0330	0.0040	0.00

5.11.2. Mitigated

Electricity (kWh/yr) and CO2 and CH4 and N2O and Natural Gas (kBTU/yr)

Land Use	Electricity (kWh/yr)	CO2	CH4	N2O	Natural Gas (kBTU/yr)
Congregate Care (Assisted Living)	339,550	346	0.0330	0.0040	773,569
Parking Lot	49,056	346	0.0330	0.0040	0.00

5.12. Operational Water and Wastewater Consumption

5.12.1. Unmitigated

Land Use	Indoor Water (gal/year)	Outdoor Water (gal/year)
Congregate Care (Assisted Living)	2,440,427	0.00
Parking Lot	0.00	52,544

5.12.2. Mitigated

Land Use	Indoor Water (gal/year)	Outdoor Water (gal/year)
Congregate Care (Assisted Living)	2,440,427	0.00
Parking Lot	0.00	52,544

5.13. Operational Waste Generation

5.13.1. Unmitigated

Land Use	Waste (ton/year)	Cogeneration (kWh/year)
Congregate Care (Assisted Living)	55	0.00
Parking Lot	0.00	0.00

5.13.2. Mitigated

Land Use	Waste (ton/year)	Cogeneration (kWh/year)
Congregate Care (Assisted Living)	55	0.00
Parking Lot	0.00	0.00

5.14. Operational Refrigeration and Air Conditioning Equipment

5.14.1. Unmitigated

Land Use	Equipment Type	Refrigerant	GWP	Quantity (kg)	Operations Leak Rate	Service Leak Rate	Times Serviced
Congregate Care (Assisted Living)	Average room A/C & Other residential A/C and heat pumps	R-410A	2,088	< 0.005	2.5	2.5	10.0
Congregate Care (Assisted Living)	Household refrigerators and/or freezers	R-134a	1,430	0.22	0.60	0.00	1.00

5.14.2. Mitigated

Land Use	Equipment Type	Refrigerant	GWP	Quantity (kg)	Operations Leak Rate	Service Leak Rate	Times Serviced
Congregate Care (Assisted Living)	Average room A/C & Other residential A/C and heat pumps	R-410A	2,088	< 0.005	2.5	2.5	10.0
Congregate Care (Assisted Living)	Household refrigerators and/or freezers	R-134a	1,430	0.22	0.60	0.00	1.00

5.15. Operational Off-Road Equipment

5.15.1. Unmitigated

5.15.2. Mitigated

5.16. Stationary Sources

5.16.1. Emergency Generators and Fire Pumps

5.16.2. Process Boilers

5.17. User Defined

5.18. Vegetation

5.18.1. Land Use Change

5.18.1.1. Unmitigated

Vegetation Land Use Type	Vegetation Soil Type	Initial Acres	Final Acres

5.18.1.2. Mitigated

Vegetation Land Use Type	Vegetation Soil Type	Initial Acres	Final Acres

5.18.1. Biomass Cover Type

5.18.1.1. Unmitigated

Biomass Cover Type	Initial Acres	Final Acres

5.18.1.2. Mitigated

Biomass Cover Type	Initial Acres	Final Acres

5.18.2. Sequestration

5.18.2.1. Unmitigated

Tree Type	Number	Electricity Saved (kWh/year)	Natural Gas Saved (btu/year)

5.18.2.2. Mitigated

Tree Type	Number	Electricity Saved (kWh/year)	Natural Gas Saved (btu/year)

6. Climate Risk Detailed Report

6.1. Climate Risk Summary

Cal-Adapt midcentury 2040–2059 average projections for four hazards are reported below for your project location. These are under Representation Concentration Pathway (RCP) 8.5 which assumes GHG emissions will continue to rise strongly through 2050 and then plateau around 2100.

Climate Hazard	Result for Project Location	Unit
Temperature and Extreme Heat	23	annual days of extreme heat
Extreme Precipitation	0.00	annual days with precipitation above 20 mm
Sea Level Rise	—	meters of inundation depth
Wildfire	0.00	annual hectares burned

Temperature and Extreme Heat data are for grid cell in which your project are located. The projection is based on the 98th historical percentile of daily maximum/minimum temperatures from observed historical data (32 climate model ensemble from Cal-Adapt, 2040–2059 average under RCP 8.5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.
Extreme Precipitation data are for the grid cell in which your project are located. The threshold of 20 mm is equivalent to about ¾ an inch of rain, which would be light to moderate rainfall if received over a full day or heavy rain if received over a period of 2 to 4 hours. Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.
Sea Level Rise data are for the grid cell in which your project are located. The projections are from Radke et al. (2017), as reported in Cal-Adapt (Radke et al., 2017, CEC-500-2017-008), and consider inundation location and depth for the San Francisco Bay, the Sacramento-San Joaquin River Delta and California coast resulting different increments of sea level rise coupled with extreme storm events. Users may select from four scenarios to view the range in potential inundation depth for the grid cell. The four scenarios are: No rise, 0.5 meter, 1.0 meter, 1.41 meters
Wildfire data are for the grid cell in which your project are located. The projections are from UC Davis, as reported in Cal-Adapt (2040–2059 average under RCP 8.5), and consider historical data of climate, vegetation, population density, and large (> 400 ha) fire history. Users may select from four model simulations to view the range in potential wildfire probabilities for the grid cell. The four simulations make different assumptions about expected rainfall and temperature are: Warmer/drier (HadGEM2-ES), Cooler/wetter (CNRM-CM5), Average conditions (CanESM2), Range of different rainfall and temperature possibilities (MIROC5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

6.2. Initial Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	1	0	0	N/A
Extreme Precipitation	N/A	N/A	N/A	N/A
Sea Level Rise	N/A	N/A	N/A	N/A
Wildfire	N/A	N/A	N/A	N/A
Flooding	N/A	N/A	N/A	N/A
Drought	0	0	0	N/A
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	N/A	N/A	N/A	N/A

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.
The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.
The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores do not include implementation of climate risk reduction measures.

6.3. Adjusted Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	1	1	1	2
Extreme Precipitation	N/A	N/A	N/A	N/A
Sea Level Rise	N/A	N/A	N/A	N/A

Wildfire	N/A	N/A	N/A	N/A
Flooding	N/A	N/A	N/A	N/A
Drought	1	1	1	2
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	N/A	N/A	N/A	N/A

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.
The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.
The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores include implementation of climate risk reduction measures.

6.4. Climate Risk Reduction Measures

7. Health and Equity Details

7.1. CalEnviroScreen 4.0 Scores

The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.

Indicator	Result for Project Census Tract
Exposure Indicators	—
AQ-Ozone	89
AQ-PM	7.4
AQ-DPM	27
Drinking Water	45
Lead Risk Housing	4.5
Pesticides	0.00
Toxic Releases	1.6
Traffic	51
Effect Indicators	—
CleanUp Sites	50
Groundwater	0.00

Haz Waste Facilities/Generators	67
Impaired Water Bodies	0.00
Solid Waste	0.00
Sensitive Population	—
Asthma	20
Cardio-vascular	17
Low Birth Weights	—
Socioeconomic Factor Indicators	—
Education	16
Housing	62
Linguistic	6.3
Poverty	42
Unemployment	94

7.2. Healthy Places Index Scores

The maximum Health Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

Indicator	Result for Project Census Tract
Economic	—
Above Poverty	64.90440139
Employed	3.849608623
Median HI	58.78352368
Education	—
Bachelor's or higher	77.86475042
High school enrollment	100
Preschool enrollment	9.5983575
Transportation	—
Auto Access	14.80816117
Active commuting	50.2245605

Social	—
2-parent households	73.14256384
Voting	87.47593995
Neighborhood	—
Alcohol availability	82.25330425
Park access	13.1271654
Retail density	16.93827794
Supermarket access	31.8747594
Tree canopy	29.19286539
Housing	—
Homeownership	80.14885153
Housing habitability	11.70281021
Low-inc homeowner severe housing cost burden	21.48081612
Low-inc renter severe housing cost burden	23.25163608
Uncrowded housing	96.93314513
Health Outcomes	—
Insured adults	68.95932247
Arthritis	0.0
Asthma ER Admissions	83.1
High Blood Pressure	0.0
Cancer (excluding skin)	0.0
Asthma	0.0
Coronary Heart Disease	0.0
Chronic Obstructive Pulmonary Disease	0.0
Diagnosed Diabetes	0.0
Life Expectancy at Birth	39.4
Cognitively Disabled	68.5
Physically Disabled	3.9

Heart Attack ER Admissions	70.7
Mental Health Not Good	0.0
Chronic Kidney Disease	0.0
Obesity	0.0
Pedestrian Injuries	19.6
Physical Health Not Good	0.0
Stroke	0.0
Health Risk Behaviors	—
Binge Drinking	0.0
Current Smoker	0.0
No Leisure Time for Physical Activity	0.0
Climate Change Exposures	—
Wildfire Risk	0.0
SLR Inundation Area	0.0
Children	99.4
Elderly	0.4
English Speaking	98.1
Foreign-born	14.2
Outdoor Workers	98.2
Climate Change Adaptive Capacity	—
Impervious Surface Cover	72.8
Traffic Density	24.9
Traffic Access	23.0
Other Indices	—
Hardship	45.0
Other Decision Support	—
2016 Voting	95.1

7.3. Overall Health & Equity Scores

Metric	Result for Project Census Tract
CalEnviroScreen 4.0 Score for Project Location (a)	14
Healthy Places Index Score for Project Location (b)	39
Project Located in a Designated Disadvantaged Community (Senate Bill 535)	No
Project Located in a Low-Income Community (Assembly Bill 1550)	No
Project Located in a Community Air Protection Program Community (Assembly Bill 617)	No

a: The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.
b: The maximum Health Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

7.4. Health & Equity Measures

No Health & Equity Measures selected.

7.5. Evaluation Scorecard

Health & Equity Evaluation Scorecard not completed.

7.6. Health & Equity Custom Measures

No Health & Equity Custom Measures created.

8. User Changes to Default Data

8.1. Justifications

Screen	Justification
Land Use	Congregate Care represents the proposed residential building (60 beds/units) and dining hall. Parking represents new parking lot, internal drives and driveway expansion. Assumes 10% of default CalEEMod acreage would be for landscaping and 5% landscaped area for parking improvements.
Construction: Construction Phases	Assumes approximately 2 year buildout, starting 6/1/26 and operational in 2028. Assumes "Demolition" would be 3 months, which includes asphalt removal and building renovations. "Site Preparation" phase removed, consistent with 2020 EIR.
Construction: Off-Road Equipment	Assumes CalEEMod default construction equipment due to revised Project conditions. Assumes Tier 4 Final engines, consistent with 2020 EIR.

Construction: Paving	Assumes 95% of paved area is asphalt, the rest concrete/other.
Operations: Vehicle Data	Consistent with 2020 EIR, assumes entire campus daily trips = 1,860 trips.
Operations: Hearths	No wood burning appliances proposed.