CITY OF INDIO
VENTANA SPECIFIC PLAN

DRAFT ENVIRONMENTAL IMPACT REPORT

SCH No. 2021010037



Prepared for:

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CITY OF INDIO

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CITY OF INDIO
VENTANA SPECIFIC PLAN

DRAFT
ENVIRONMENTAL IMPACT REPORT

EXECUTIVE SUMMARY & ENVIRONMENTAL MATRIX

INTRODUCTION

The City of Indio has prepared this Environmental Impact Report (EIR) to evaluate the potential environmental impacts related to the VENTANA Specific Plan Project (proposed Project or Project). The City is the lead agency under the California Environmental Quality Act (CEQA) for this Project.

The EIR has been prepared in accordance with CEQA (as amended) (Public Resources Code §§21000-21189.3) and the State CEQA Guidelines (California Code of Regulations, Title 14, Chapter 3, §§15000-15387). Under State CEQA Guidelines §15121:

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

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

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

Under State CEQA Guidelines §15123, this Executive Summary describes the proposed Project, potentially significant impacts and required mitigation measures. This Section also includes a summary of the alternatives to the Project evaluated in this EIR; issues of concern/areas of controversy known to the Lead Agency; and issues to be resolved including how to choose among alternatives and how to best mitigate the potentially significant effects.

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SUMMARY OF THE PROPOSED PROJECT

The Project consists of the following components:

1. A General Plan Amendment to add a new land use designation, "Transitional Neighborhood", allowing 0-3 DU/AC, and a concurrent Land Use Map Amendment designating the 45.17 acres with this new land use designation. The "Transitional Neighborhood" designation encourages variety in lot size and product type, as shown in Exhibit 1-6, Transitional Neighborhood Text, to promote diversity and suit various needs within the same community.
2. A Specific Plan to govern the zoning for the property, allowing 103 single family homes on the 45.17 acres.
3. A Tentative Tract Map subdividing the 45.17 acres into 103 single family lots as well as lettered lots for open space, stormwater retention and streets.
4. A Design Review application to consider the site plan, architectural design and landscaping for the Project.

This EIR tiers off of the General Plan Update Environmental Impact Report (GPU EIR), which analyzed the Project site in its assessment of all resource areas. This EIR also considers the impacts of the General Plan Amendment, at full allowable buildout of 136 units, and of the proposed Project, which would result in a total of 103 units.

Background and Project Summary

The Project area is located on the north side of Avenue 50 between Jefferson Street and Madison Street in the City of Indio, Riverside County, California. The Project site is currently vacant, contains sparse vegetation and is surrounded by vacant land and residential development. The site is currently designated "Desert Estates Neighborhood" in the City's 2040 General Plan, which allows low density residential development of up to 1 dwelling units per acre (DU/AC). The City's Zoning Map currently designates the subject site as "Country Estates Indio Ranchos Zone(s)" and allows for low density residential developments on 1- or 2-acre minimum lots, respectively.

In 2020, a General Plan Amendment (GPA) was proposed concurrent with the VENTANA Specific Plan that would change the site's General Plan designation to "Suburban Neighborhood," which allows a residential density of up to 8 DU/AC. An Initial Study/Mitigated Negative Declaration was prepared for the VENTANA Specific Plan and the GPA in June 2020. Based on comments received on the Initial Study and Planning Commission hearings conducted on the project, there were concerns regarding the density allowed under the Suburban Neighborhood designation if applied to this part of the City. Upon consideration of the comments and potential Project impacts, the applicant proposed that the GPA be modified to create a new residential land use designation that allows a residential density of up to 3 DU/AC and proposed amendments to both the General Plan text and the land use map. This new land use designation, labeled "Transitional Neighborhood," would provide an interim density between the Desert Estates and Suburban Neighborhood designations. The applicant proposed no change to the VENTANA Specific Plan and proposed development on the Project site.

The VENTANA Specific Plan establishes building and development standards for the entire 45.17-acre Project area, including building height, building setbacks, development density, landscaping and parking. In addition, the Specific Plan establishes Design Guidelines that would serve to guide the aesthetic character and visual quality of future development on the site. The Specific Plan will result in an overall density of 2.3 DU/AC.

In addition, the Project also includes a Tentative Tract Map to subdivide the site and a Design Review on the Project site plan, architectural design and landscaping.

STATEMENT OF PROJECT OBJECTIVES

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

The project objectives identify the purpose of the VENTANA Specific Plan Project. The City has identified the following list of objectives for the Project.

- Provide a bridge and buffer between the rural atmosphere of the Desert Estates and more urban Suburban Neighborhoods.
- Provide a range of residential densities that allow a broad range of housing for all segments of Indio's population.
- Provide diverse products of modern, energy efficient single-family homes in a planned community.
- Provide neighborhood parks, community gathering spaces, passive parks and/or dog parks within the neighborhood, consistent with the General Plan's vision for a more connected community.
- Expand housing inventory for City residents.

SUMMARY OF PROJECT IMPACTS AND MITIGATION MEASURES

Section 2, Environmental Impacts and Mitigation Measures of this DEIR presents the environmental impact analyses for all CEQA resource topics and identifies mitigation measures to reduce potentially significant impacts to a less than significant level, where appropriate and feasible. A summary of all impacts and mitigation measures from Section 2 is provided in Table M-1 at the end of this summary. The table is intended to provide a summary of the project's impacts and mitigation measures; please refer to Section 2 for the complete analysis and discussion. As shown in the table, the DEIR analysis indicates that implementation of the proposed Project will not result in any unmitigable environmental impacts.

ALTERNATIVES SUMMARY

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

- Extent to which the alternative would accomplish most of the objectives of the Project;
- Extent to which the alternative would avoid or lessen any of the identified significant adverse environmental effects of the Project;
- Feasibility of the alternative, taking into account site/geographic suitability, economic viability, constructability, and consistency with regulatory requirements; and
- Appropriateness of the alternative in contributing to a reasonable range of alternatives necessary to allow a reasoned choice by decision-makers.

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

Alternative 1 – "No Project/Existing General Plan" Alternative

Alternative 1, the No Project/Existing General Plan Alternative, describes buildout of the Project area consistent with the existing General Plan land use designation. Alternative 1 assumes the site will be built out at 1 DU/AC, the maximum density allowed by the current "Desert Estates Neighborhood" designation in the City's 2040 General Plan, and would result in 45 single family dwelling units.

Alternative 2 – "Suburban Neighborhood" Alternative

Alternative 2 would include a General Plan Amendment which changes the designation of the site to Suburban Neighborhood, a land use designation which currently exists in the General Plan. The Suburban Neighborhood designation allows 0-8 units per acre, and is the next density range currently available in the City's General Plan. Under this alternative, up to 361 residential units could be constructed. For purposes of this analysis, and based on the need for common area open space, parking and retention areas, it has been assumed that the units would be attached condominiums, townhomes or apartments. This alternative would still be accessed from Avenue 50.

ISSUES OF CONCERN/AREAS OF CONTROVERSY

When a Lead Agency determines that an EIR is required for a project, a Notice of Preparation (NOP) must be prepared and submitted to the State Clearinghouse. The purpose of the NOP is to provide responsible and trustee agencies, and the public, with sufficient information describing the proposed Project and the potential environmental effects, to enable interested parties/persons to make a meaningful response. The City issued the NOP for the Project on January 7, 2021, and it concluded after the 30-day public review period concluded on February 8, 2021. The City received comments from residents and/or property owners in the Project vicinity and their representatives, the Native American Heritage Commission, and the South Coast Air Quality Management District. Concerns raised by residents and property owners included land use compatibility, light, noise, and traffic impacts on the surrounding area. The comments and concerns have been included in the analysis within Section 2 of this DEIR and also addressed in special studies for the Project. The comment letters all address and request further analysis and mitigation, where applicable, and do not raise any issues considered controversial.

ENVIRONMENTAL SUMMARY MATRIX

This Environmental Impact Report (EIR) has been prepared to assess the potential impacts to the environment that may result from the approval and implementation of the proposed Project. The Project includes 45.17 acres of land in the City of Indio. The Project includes a General Plan Amendment, Specific Plan, Tentative Tract Map and Design Review that would result in the development of a low-density residential development consisting of 103 residential units, a dog park, pedestrian trails, and open space common areas.

Summary of Alternatives

The proposed Project includes two alternatives as follows:

Alternative 1 – "No Project/Existing General Plan" Alternative

Alternative 1, the No Project/Existing General Plan Alternative, describes buildout of the Project area consistent with the existing General Plan land use designation. Alternative 1 assumes the site will be built out at 1 DU/AC, the maximum density allowed by the current "Desert Estates Neighborhood" designation in the City's 2040 General Plan, and would result in 45 single family dwelling units.

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Alternative 2 would include a General Plan Amendment which changes the designation of the site to Suburban Neighborhood, a land use designation which currently exists in the General Plan. The Suburban Neighborhood designation allows 0-8 units per acre, and is the next density range currently available in the City's General Plan. Under this alternative, up to 361 residential units could be constructed.

Definition of Impacts

The following discussion briefly summarizes each category of analysis, including existing conditions, project impacts and applicable mitigation measures recommended to reduce impacts to acceptable or insignificant levels. Levels of impact include the following:

Potentially Significant Impacts: Those impacts which, prior to the implementation of mitigation measures, could potentially adversely impact environmental conditions.

Less Than Significant Impacts: Those impacts, which, by virtue of the environmental conditions, predisposing existing development, or the implementation of mitigation measures, are reduced to acceptable or "insignificant" levels.

No Impacts: Those conditions where the proposed Project will not impact the environmental condition.

Areas of Controversy

There are no areas of controversy in the Project's physical characteristics that are not resolved by project design, development management and operation, mitigation measures or standard on-going monitoring.

TABLE M-1: SUMMARY OF IMPACTS AND MITIGATION MEASURES

Impact	Level of Impact Before Mitigation	Proposed Mitigation Measure(s)	Level of Significance after Mitigation
Section 2.3 Aesthetics			
a) Have a substantial adverse effect on a scenic vista?	Less Than Significant	No mitigation is required.	Less Than Significant
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	No Impact	No mitigation is required.	No Impact
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its	Less Than Significant	No mitigation is required.	Less Than Significant

TABLE M-1: SUMMARY OF IMPACTS AND MITIGATION MEASURES			
Impact	**Level of Impact Before Mitigation**	**Proposed Mitigation Measure(s)**	**Level of Significance after Mitigation**
surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?			
d) Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?	Less Than Significant	No mitigation is required.	Less Than Significant
Section 2.4 Agricultural and Forestry Resources			
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and	Less Than Significant	No mitigation is required.	Less Than Significant

TABLE M-1: SUMMARY OF IMPACTS AND MITIGATION MEASURES			
Impact	**Level of Impact Before Mitigation**	**Proposed Mitigation Measure(s)**	**Level of Significance after Mitigation**
Monitoring Program of the California Resources Agency, to non-agricultural use.			
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	Less Than Significant	No mitigation is required.	Less Than Significant
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland production (as defined by Government Code section 51104(g))?	No Impact	No mitigation is required.	No Impact
d) Result in the loss of forest land or conversion of forest land to non-forest use?	No Impact	No mitigation is required.	No Impact

TABLE M-1: SUMMARY OF IMPACTS AND MITIGATION MEASURES			
Impact	**Level of Impact Before Mitigation**	**Proposed Mitigation Measure(s)**	**Level of Significance after Mitigation**
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	No Impact	No mitigation is required.	No Impact
Section 2.5 Air Quality			
a) Conflict with or obstruct implementation of the applicable air quality plan?	No Impact	No mitigation is required.	No Impact
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	Less Than Significant	No mitigation is required.	Less Than Significant

TABLE M-1: SUMMARY OF IMPACTS AND MITIGATION MEASURES			
Impact	**Level of Impact Before Mitigation**	**Proposed Mitigation Measure(s)**	**Level of Significance after Mitigation**
c) Expose sensitive receptors to substantial pollutant concentrations?	Less Than Significant	No mitigation is required.	Less Than Significant
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	Less Than Significant	No mitigation is required.	Less Than Significant
Section 2.6 Biological Resources			
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	Potentially Significant	BIO-1: The Project proponent shall be required to pay the CVMSHCP local development mitigation fee to mitigate for impacts to covered species and natural communities within the Project site. BIO-2: 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, 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,	Less Than Significant

TABLE M-1: SUMMARY OF IMPACTS AND MITIGATION MEASURES			
Impact	**Level of Impact Before Mitigation**	**Proposed Mitigation Measure(s)**	**Level of Significance after Mitigation**
		the CDFW generally recommends avoidance buffers of about 500 feet for birds-of-prey, and 100 – 300 feet for songbirds . BIO-3: A qualified biologist shall conduct two (2) take avoidance pre-construction burrowing owl surveys onsite. The first shall occur between 14 and 30 days prior to ground disturbance, and the second shall occur within 24 hours of ground disturbance. If burrowing owls are detected, the Project proponent shall consult with CDFW to determine what course of action is needed, such as the use of exclusion devices (if applicable) to discourage owls from using burrows that are believed to be in jeopardy of being impacted by implementation of the Project.	
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?	No Impact	No mitigation is required.	No Impact

TABLE M-1: SUMMARY OF IMPACTS AND MITIGATION MEASURES			
Impact	**Level of Impact Before Mitigation**	**Proposed Mitigation Measure(s)**	**Level of Significance after Mitigation**
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	No Impact	No mitigation is required.	No Impact
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?	No Impact	No mitigation is required.	No Impact
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree	Less Than Significant	No mitigation is required.	Less Than Significant

TABLE M-1: SUMMARY OF IMPACTS AND MITIGATION MEASURES			
Impact	**Level of Impact Before Mitigation**	**Proposed Mitigation Measure(s)**	**Level of Significance after Mitigation**
preservation policy or ordinance?			
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	Less Than Significant	No mitigation is required.	Less Than Significant
Section 2.7 Cultural Resources			
a) Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?	No Impact	No mitigation is required.	No Impact
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?	Potentially Significant	CUL-1: Earth-moving activities including grading, grubbing, trenching, or excavations at the site shall be monitored by a qualified archaeologist and a Torres Martinez DCI or ACBCI Native American monitor(s). If any cultural materials more than 50 years of age are discovered, they shall be recorded and evaluated in the field. The archaeologist and monitors shall be prepared to	Less Than Significant

TABLE M-1: SUMMARY OF IMPACTS AND MITIGATION MEASURES			
Impact	**Level of Impact Before Mitigation**	**Proposed Mitigation Measure(s)**	**Level of Significance after Mitigation**
		recover artifacts quickly to avoid construction delays but shall have the power to temporarily halt or divert construction equipment to allow for controlled archaeological recovery if a substantial cultural deposit is encountered. On-site monitoring shall be coordinated with the nearest Native American groups who may wish to participate. The monitors shall determine when excavations have reached sufficient depth to preclude the occurrence of cultural resources, and when monitoring should conclude. If artifacts are discovered, these shall be processed, catalogued, analyzed, and prepared for permanent curation in a repository with permanent retrievable storage that would allow for additional research in the future.	
c) Disturb any human remains, including those interred outside of formal cemeteries?	No Impact	No mitigation is required.	No Impact
Section 2.8 Energy			
a) Result in potentially significant environmental impact due to wasteful,	Less Than Significant	No mitigation is required.	Less Than Significant

TABLE M-1: SUMMARY OF IMPACTS AND MITIGATION MEASURES			
Impact	**Level of Impact Before Mitigation**	**Proposed Mitigation Measure(s)**	**Level of Significance after Mitigation**
inefficient, or unnecessary consumption of energy resources, during project construction or operation?			
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	Less Than Significant	No mitigation is required.	Less Than Significant
Section 2.9 Geology and Soils			
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines	No Impact	No mitigation is required.	No Impact

TABLE M-1: SUMMARY OF IMPACTS AND MITIGATION MEASURES			
Impact	**Level of Impact Before Mitigation**	**Proposed Mitigation Measure(s)**	**Level of Significance after Mitigation**
and Geology Special Publication 42.			
ii) Strong seismic ground shaking?	Less Than Significant	No mitigation is required.	Less Than Significant
iii) Seismic related ground failure, including liquefaction?	No Impact	No mitigation is required.	No Impact
iv) Landslides?	No Impact	No mitigation is required.	No Impact
b) Result in substantial soil erosion or the loss of topsoil?	Less Than Significant	No mitigation is required.	Less Than Significant
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?	Potentially Significant	GEO-1: The Project structural engineer and contractor should follow the recommendations provided in the Project Geotechnical Investigation report prepared by Sladden Engineering on November 20, 2019 during Project design and construction, including: GEO-2: Areas to be graded and paved should be cleared of any existing improvements, foundation elements, vegetation, root systems and debris. All areas scheduled to receive fill should be cleared of old fills and any irreducible matter. The strippings should be removed off site, or stockpiled for later use in landscape areas. Voids left by obstructions should be properly backfilled in	Less Than Significant

TABLE M-1: SUMMARY OF IMPACTS AND MITIGATION MEASURES			
Impact	**Level of Impact Before Mitigation**	**Proposed Mitigation Measure(s)**	**Level of Significance after Mitigation**
		accordance with the compaction recommendations of the geotechnical report. GEO-3: Over-excavation and re-compaction should be conducted throughout the proposed building areas to achieve firm and uniform bearing conditions. All artificial fill soil and native low density near surface native soil should be removed to a depth of at least 3 feet below existing grade or 3 feet below the bottom of the footings, whichever is deeper. Remedial grading should extend laterally, a minimum of five feet beyond the footing limits. The soil exposed by over-excavation should then be scarified, moisture conditioned to near optimum moisture content and compacted to at least 90 percent relative compaction. The previously removed soil may then be replaced as engineered fill soil as recommended in Mitigation Measure GEO-4. GEO-4: **Compaction**. Soil to be used as engineered fill should be free of organic material, debris, and other deleterious substances, and should not contain irreducible matter greater than three inches in maximum dimension. All fill materials should be placed in thin lifts, not exceeding six inches in a loose condition. If import fill is required, the material should be of a low to non-expansive nature and should meet the following criteria:	

TABLE M-1: SUMMARY OF IMPACTS AND MITIGATION MEASURES			
Impact	**Level of Impact Before Mitigation**	**Proposed Mitigation Measure(s)**	**Level of Significance after Mitigation**
		Plastic Index: less than 12 Liquid Limit: less than 35 Percent Soil Passing #200 Sieve: between 15% and 35% Maximum Aggregate Size: 3 inches The subgrade and all fill should be compacted with acceptable compaction equipment, to at least 90 percent relative compaction. The bottom of the excavations should be observed by a representative of Sladden Engineering prior to fill placement. Compaction testing should be performed on all lifts in order to ensure proper placement of the fill materials. Excavation and compaction recommendations are summarized below. • Remedial Grading: Removal and compaction of all artificial fill soil and loose native soil to depths of at least 3 feet below existing grade or 3 feet below the bottom of footings, whichever is deeper. Removals should extend laterally a minimum of 5 feet beyond the footing limits. • Native/Import Engineered Fill: Place in thin lifts not exceeding 6 inches in a loose condition, compact to a minimum of 90 percent relative compaction within 2 percent of the optimum moisture content.	

TABLE M-1: SUMMARY OF IMPACTS AND MITIGATION MEASURES			
Impact	**Level of Impact Before Mitigation**	**Proposed Mitigation Measure(s)**	**Level of Significance after Mitigation**
		• Asphalt Concrete Sections: Compact the top 12 inches to at least 95 percent compaction within 2 percent of optimum moisture content. GEO-5: **Slabs-on-grade**. Slab thickness, floor slab design and reinforcement should be determined by the Structural Engineer. A minimum slab thickness of 4.0 inches and minimum reinforcement of #3 bar at 24 inches on center shall be required in both directions. All slab reinforcement should be supported on concrete chairs to ensure that reinforcement is placed at slab mid-height. GEO-6: **Soil Corrosivity**. Soluble sulfate content of the surface soil should be reevaluated after grading, and appropriate concrete mix designs should be established based upon postgrading test results. The site soil is considered to have a "moderate" corrosion potential with respect to ferrous metal installations. A corrosion expert should be consulted regarding appropriate corrosion protection measures for corrosion sensitive installations. GEO-7: **Drainage.** All final grades should be provided with positive gradients away from foundations to provide rapid removal of surface water runoff to an adequate	

TABLE M-1: SUMMARY OF IMPACTS AND MITIGATION MEASURES			
Impact	**Level of Impact Before Mitigation**	**Proposed Mitigation Measure(s)**	**Level of Significance after Mitigation**
		discharge point. No water should be allowed to pond on or be immediately adjacent to foundation elements. Subgrade drainage should be evaluated upon completion of the precise grading plans and in the field during grading.	
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	No Impact	No mitigation is required.	No Impact
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	No Impact	No mitigation is required.	No Impact
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	Potentially Significant	GEO-8: **Paleontological Resources.** Prior to the issuance of grading permits, a paleontological resource mitigation program (PRIMP) shall be prepared by a qualified professional paleontologist to specify the steps to be taken to mitigate impacts to paleontological resources	Less Than Significant

TABLE M-1: SUMMARY OF IMPACTS AND MITIGATION MEASURES			
Impact	**Level of Impact Before Mitigation**	**Proposed Mitigation Measure(s)**	**Level of Significance after Mitigation**
		and indicate where and how often construction monitoring will be required for the Project. • Worker's Environmental Awareness Program (WEAP) training shall be prepared prior to the start of Project-related ground disturbance and presented in-person to all field personnel to describe the types of fossils that may be found and the procedures to follow if any are encountered. • The PRIMP shall indicate where construction monitoring is required and the frequency of monitoring. Based on the Project-specific paleontological study prepared by Applied Earthworks, Inc. in March 2020, an initial period of full-time construction monitoring at all depths throughout the Project area is recommended. Full-time monitoring may be reduced to spot-check monitoring at the discretion of the Project Paleontologist, if no intact and significant paleontological resources are encountered during the initial period of construction monitoring. • The PRIMP also will provide details about fossil collection, analysis, and preparation for permanent curation at an approved repository. • The PRIMP shall describe the different reporting standards to be used – monitoring with negative findings versus monitoring resulting in fossil discoveries.	

TABLE M-1: SUMMARY OF IMPACTS AND MITIGATION MEASURES			
Impact	**Level of Impact Before Mitigation**	**Proposed Mitigation Measure(s)**	**Level of Significance after Mitigation**
Section 2.10 Greenhouse Gas Emissions			
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	Less Than Significant	No mitigation is required.	Less Than Significant
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	Less Than Significant	No mitigation is required.	Less Than Significant
Section 2.11 Hazards & Hazardous Materials			
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	Less Than Significant	No mitigation is required.	Less Than Significant
b) Create a significant hazard to the public or the environment through reasonably foreseeable	Less Than Significant	No mitigation is required.	Less Than Significant

TABLE M-1: SUMMARY OF IMPACTS AND MITIGATION MEASURES			
Impact	**Level of Impact Before Mitigation**	**Proposed Mitigation Measure(s)**	**Level of Significance after Mitigation**
upset and accident conditions involving the release of hazardous materials into the environment?			
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	No Impact	No mitigation is required.	No Impact
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	No mitigation is required.	No Impact

TABLE M-1: SUMMARY OF IMPACTS AND MITIGATION MEASURES			
Impact	**Level of Impact Before Mitigation**	**Proposed Mitigation Measure(s)**	**Level of Significance after Mitigation**
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, result in a safety hazard or excessive noise for people residing or working in the project area?	No Impact	No mitigation is required.	No Impact
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	No Impact	No mitigation is required.	No Impact
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	No Impact	No mitigation is required.	No Impact

TABLE M-1: SUMMARY OF IMPACTS AND MITIGATION MEASURES			
Impact	**Level of Impact Before Mitigation**	**Proposed Mitigation Measure(s)**	**Level of Significance after Mitigation**
Section 2.12 Hydrology and Water Quality			
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	Less Than Significant	No mitigation is required.	Less Than Significant
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	Less Than Significant	No mitigation is required.	Less Than Significant
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:	Less Than Significant	No mitigation is required.	Less Than Significant

TABLE M-1: SUMMARY OF IMPACTS AND MITIGATION MEASURES			
Impact	**Level of Impact Before Mitigation**	**Proposed Mitigation Measure(s)**	**Level of Significance after Mitigation**
i) result in substantial erosion or siltation on- or off-site; ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site; iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or iv) impede or redirect flood flows.			
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	No Impact	No mitigation is required.	No Impact

TABLE M-1: SUMMARY OF IMPACTS AND MITIGATION MEASURES			
Impact	**Level of Impact Before Mitigation**	**Proposed Mitigation Measure(s)**	**Level of Significance after Mitigation**
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	Less Than Significant	No mitigation is required.	Less Than Significant
Section 2.11 Land Use and Planning			
a) Physically divide an established community?	No Impact	No mitigation is required.	No Impact
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	Less Than Significant	No mitigation is required.	Less Than Significant
Section 2.12 Noise			
a) Generate 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	Potentially Significant	NOI-1: The following Best Management Practices shall be implemented during construction activities on the Project site: a. During all project site excavation and grading on-site, construction contractors shall equip all construction equipment, fixed or mobile, with properly operating	Less Than Significant

TABLE M-1: SUMMARY OF IMPACTS AND MITIGATION MEASURES			
Impact	**Level of Impact Before Mitigation**	**Proposed Mitigation Measure(s)**	**Level of Significance after Mitigation**
noise ordinance, or applicable standards of other agencies?		and maintained mufflers, consistent with manufacturer standards. b. The contractor shall place all stationary construction equipment so that emitted noise is directed away from the noise sensitive receptors nearest the project site. c. Equipment shall be shut off and not left to idle when not in use. d. The contractor shall locate equipment staging in areas that will create the greatest distance between construction-related noise/vibration sources and sensitive receptors nearest the project site during all project construction. e. The project proponent shall mandate that the construction contractor prohibit the use of music or sound amplification on the project site during construction. f. The construction contractor shall limit haul truck deliveries to the same hours specified for construction equipment. g. Limit the use of heavy equipment or vibratory rollers and soil compressors along the project boundaries to the greatest degree possible. It is acknowledged that some soil compression may be necessary along the project boundaries.	

TABLE M-1: SUMMARY OF IMPACTS AND MITIGATION MEASURES			
Impact	**Level of Impact Before Mitigation**	**Proposed Mitigation Measure(s)**	**Level of Significance after Mitigation**
		h. Jackhammers, pneumatic equipment and all other portable stationary noise sources shall be shielded and noise shall be directed away from sensitive receptors. i. For the duration of construction activities, the construction manager shall serve as the contact person should noise levels become disruptive to local residents. A sign should be posted at the project site with the contact phone number.	
b) Result in the generation of excessive groundborne vibration or groundborne noise levels?	Less Than Significant	No mitigation is required.	Less Than Significant
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	No Impact	No mitigation is required.	No Impact

TABLE M-1: SUMMARY OF IMPACTS AND MITIGATION MEASURES			
Impact	**Level of Impact Before Mitigation**	**Proposed Mitigation Measure(s)**	**Level of Significance after Mitigation**
Section 2.15 Population and Housing			
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	No mitigation is required.	Less Than Significant
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	No Impact	No mitigation is required.	No Impact
Section 2.16 Public Services			
a) The project would result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities,	Less Than Significant	No mitigation is required.	Less Than Significant

TABLE M-1: SUMMARY OF IMPACTS AND MITIGATION MEASURES			
Impact	**Level of Impact Before Mitigation**	**Proposed Mitigation Measure(s)**	**Level of Significance after Mitigation**
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	Less Than Significant	No mitigation is required.	Less Than Significant
• Schools	Less Than Significant	No mitigation is required.	Less Than Significant
• Parks	Less Than Significant	No mitigation is required.	Less Than Significant
• Other public facilities	Less Than Significant	No mitigation is required.	Less Than Significant

TABLE M-1: SUMMARY OF IMPACTS AND MITIGATION MEASURES			
Impact	**Level of Impact Before Mitigation**	**Proposed Mitigation Measure(s)**	**Level of Significance after Mitigation**
Section 2.17 Recreational Resources			
a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	Less Than Significant	No mitigation is required.	Less Than Significant
b) Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	Less Than Significant	No mitigation is required.	Less Than Significant
Section 2.18 Transportation and Traffic			
a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	Less Than Significant	No mitigation is required.	Less Than Significant

TABLE M-1: SUMMARY OF IMPACTS AND MITIGATION MEASURES			
Impact	**Level of Impact Before Mitigation**	**Proposed Mitigation Measure(s)**	**Level of Significance after Mitigation**
b) Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	Less Than Significant	No mitigation is required.	Less Than Significant
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)? d) Result in inadequate emergency access?	Less Than Significant	No mitigation is required.	Less Than Significant
Section 2.19 Tribal Cultural Resources			
a) Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in	No Impact	No mitigation is required.	No Impact

TABLE M-1: SUMMARY OF IMPACTS AND MITIGATION MEASURES			
Impact	**Level of Impact Before Mitigation**	**Proposed Mitigation Measure(s)**	**Level of Significance after Mitigation**
terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or			
ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in	Potentially Significant	CUL-1: Earth-moving activities including grading, grubbing, trenching, or excavations at the site shall be monitored by a qualified archaeologist and a Torres Martinez DCI or ACBCI Native American monitor(s). If any cultural materials more than 50 years of age are discovered, they shall be recorded and evaluated in the field. The archaeologist and monitors shall be prepared to recover artifacts quickly to avoid construction delays but shall have the power to temporarily halt or divert	Less Than Significant

TABLE M-1: SUMMARY OF IMPACTS AND MITIGATION MEASURES			
Impact	**Level of Impact Before Mitigation**	**Proposed Mitigation Measure(s)**	**Level of Significance after Mitigation**
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?		construction equipment to allow for controlled archaeological recovery if a substantial cultural deposit is encountered. On-site monitoring shall be coordinated with the nearest Native American groups who may wish to participate. The monitors shall determine when excavations have reached sufficient depth to preclude the occurrence of cultural resources, and when monitoring should conclude. If artifacts are discovered, these shall be processed, catalogued, analyzed, and prepared for permanent curation in a repository with permanent retrievable storage that would allow for additional research in the future.	
Section 2.20 Utilities and Service Systems			
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	Less Than Significant	No mitigation is required.	Less Than Significant

TABLE M-1: SUMMARY OF IMPACTS AND MITIGATION MEASURES			
Impact	**Level of Impact Before Mitigation**	**Proposed Mitigation Measure(s)**	**Level of Significance after Mitigation**
could cause significant environmental effects? 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.			

TABLE M-1: SUMMARY OF IMPACTS AND MITIGATION MEASURES			
Impact	**Level of Impact Before Mitigation**	**Proposed Mitigation Measure(s)**	**Level of Significance after Mitigation**
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	No mitigation is required.	Less Than Significant

CITY OF INDIO
VENTANA SPECIFIC PLAN

DRAFT
ENVIRONMENTAL IMPACT REPORT

1. INTRODUCTION AND PROJECT DESCRIPTION

Lead Agency

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

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

The Lead Agency contact person and mailing address regarding this project is: Leila Namvar, Senior Planner, City of Indio, 100 Civic Center Mall, Indio, CA 92201. The City phone number is: (760) 541-4258; Email: lnamvar@indio.org.

Background and Project Summary

This EIR tiers off of the General Plan Update Environmental Impact Report (GPU EIR), which analyzed the Project site in its assessment of all resource areas. This EIR also considers the impacts of the General Plan Amendment, at full allowable buildout of 136 units, and of the proposed Project, which would result in a total of 103 units. Please see below for a detailed description of the Project's components.

The VENTANA Specific Plan (referred to hereafter as Project) area is located on the north side of Avenue 50 between Jefferson Street and Madison Street in the City of Indio, Riverside County, California (please see Exhibits I-1, I-2 and I-3). The Project site is currently vacant, contains sparse vegetation and is surrounded by vacant land and residential development. The site is currently designated "Desert Estates Neighborhood" in the City's 2040 General Plan, which allows low density residential development of up to 1 DU/AC. The City's Zoning Map, which was last updated in 2009, currently designates the subject site as "Country Estates Indio Ranchos Zone(s)" (CEIR-1 & CEIR-2) and allows for low density residential developments on 1- or 2-acre minimum lots, respectively.

Proposed in 2020, the VENTANA Specific Plan establishes building and development standards for the entire 45.17-acre Project area, including building height, building setbacks, development density, landscaping and parking. In addition, the Specific Plan establishes Design Guidelines that would serve to guide the aesthetic character and visual quality of future development on the site. The VENTANA Specific Plan proposes a low-density residential development consisting of 103 residential units, a dog park, pedestrian trails, and open space common areas.

In 2020, a General Plan Amendment (GPA) was proposed concurrent with the VENTANA Specific Plan that would change the site's General Plan designation to "Suburban Neighborhood," which allows a residential density of up to 8 DU/AC. An Initial Study/Mitigated Negative Declaration was prepared for the VENTANA Specific Plan and the GPA in June 2020. The City received comments on the Initial Study, and conducted Planning Commission hearings on the project. Concerns were raised regarding the density allowed under the Suburban Neighborhood designation if applied to this part of the City. Given the public comments received and further consideration of Project impacts, the applicant proposed that the GPA be modified to create a new residential land use designation that allows a residential density of up to 3 DU/AC and proposed amendments to both the General Plan text and the land use map. This new land use designation, labeled "Transitional Neighborhood," would provide an interim density between the Desert Estates and Suburban Neighborhood designations. The applicant proposed no change to the VENTANA Specific Plan and proposed development on the Project site.

This EIR has been prepared during COVID-19 restrictions, which have affected traffic on regional and local roadways, the availability of shopping and dining, and other aspects of daily life. Although the ultimate effect of COVID-19 restrictions is unknown, the analysis in this EIR is based on pre-COVID, and presumably post-COVID assumptions. For example, traffic counts for the traffic analysis were conducted prior to COVID, and have been modified based on traditional growth rates, not COVID-influenced growth rates. Similarly, air quality analysis is based on trip generation and occupancy of a fully developed project, not on partially occupied units or reduced activity.

Project Description

The Project consists of the following components:

1. A General Plan Amendment to add a new land use designation, "Transitional Neighborhood", allowing 0-3 DU/AC, and a concurrent Land Use Map Amendment designating the 45.17 acres with this new land use designation. The "Transitional Neighborhood" designation encourages variety in lot size and product type, as shown in Exhibit 1-6, Transitional Neighborhood Text, to promote diversity and suit various needs within the same community.
2. A Specific Plan to govern the zoning for the property, allowing 103 single family homes on the 45.17 acres.
3. A Tentative Tract Map subdividing the 45.17 acres into 103 single family lots as well as lettered lots for open space, stormwater retention and streets.
4. A Design Review application to consider the site plan, architectural design and landscaping for the Project.

Each of the Project components is described below.

The site is currently designated "Desert Estates Neighborhood" in the City's 2040 General Plan, which allows low density residential development of up to 1 DU/AC. The GPA is proposed concurrent with the VENTANA Specific Plan that would create a new residential land use designation, "Transitional Neighborhood," that allows a residential density of up to 3 DU/AC. The GPA proposes amendments to both the General Plan text and the land use map. In the case of the land use map, the Transitional Neighborhood designation would be applied only to the 45.17 acres associated with the Project. This GPA will result in an increase in density on the site from a maximum of 45 units in Desert Estates Neighborhood, to a maximum of 136 units under the Transitional Neighborhood designation.

The VENTANA Specific Plan establishes building and development standards for the entire 45.17-acre Project area, including density, building height, building setbacks, development density, landscaping and parking. These standards will prevail over the City of Indio Municipal Code standards for the site should the Specific Plan be approved by the City Council. In addition, the Specific Plan establishes Design Guidelines that would serve to guide the aesthetic character and visual quality of future development on the site.

The VENTANA Specific Plan proposes a low-density residential development consisting of 103 residential units (a density of 2.3 units per acre, consistent with the GPA), a dog park, pedestrian trails, and open space common areas (Exhibit I-4). The Specific Plan divides the site into two Planning Areas (PA) (Exhibit I-5). Planning Area 1 is the non-gated portion of the development and consists of lots 1-23. Planning Area 1 consists of a compact community of one- and two-story single-family homes on lots of 7,000 square feet or more. Planning Area 2 is the gated portion of the development and consists of lots 24-103. Planning Area 2 is further divided into Planning Areas 2A and 2B to distinguish between the midsize and larger lots

proposed within the Specific Plan area. Planning Area 2A contains lots 24-75, and would allow single-story single family homes on lots of 11,000 square feet or more; and Planning Area 2B contains the larger lots, 76-103, which would allow single-story single family homes on lots of 13,500 square feet or more.

The following table is a summary of the various development standards within the Specific Plan.

Table 1-1
Planning Area Development Standards
VENTANA Specific Plan

Development Standard	PA 1 (Lots 1-23)	PA 2A (Lots 24-75)	PA 2B (Lots 76-103)
Density, Avg.	2.3 DU/AC		
Min/Max Unit Size incl. Garage	1,200 SF/3,100 SF	1,200 SF/4,100 SF	1,200 SF/4,600 SF
Maximum Lot Coverage	60%	50%	50%
Maximum Height/Stories	28 ft/ 2 stories	24 ft / 1 story	24 ft / 1 story
Typical Lot Width	55 ft	80 ft	90 ft
Typical Lot Depth	130 ft	140 ft	150 ft
Minimum Lot Area	7,000 SF	11,000 SF	13,500 SF
Setback - Front	15 ft	15 ft	15 ft
Setback - Front – Garage	20 ft	20 ft	20 ft
Setback – Side	6 ft	8 ft	10 ft
Setback - Rear	20 ft	20 ft	25 ft
Private Garages	400 SF min	≤ 4 Rooms = 400 SF min > 4 Rooms = 600 SF min	≤ 4 Rooms = 400 SF min > 4 Rooms = 600 SF min

The proposed Tentative Tract Map (TTM 37884) will subdivide the site for the 103 lots, as well as lettered lots for streets, common areas and similar ancillary uses. The proposed Project will result in an overall density of 2.3 dwelling units per acre (DU/AC). The TTM also provides for the widening of Avenue 50 to its ultimate General Plan half-section width, including a second travel lane, bike lane, curb, sidewalk and landscaped parkway area along the entire frontage of the Project. The Project also includes private roadways with an entrance/exit accessible via Avenue 50. All proposed homes will include garages and curbside parking for guest use.

The Design Review application implements the Specific Plan, and includes detailed plans for all of the home designs within the project, as well as landscaping plans for the front yards, common areas and project parkways. Elevations, floor plans and roof plans are provided for each of the model homes, which include multiple façade designs. The architectural style of the homes varies, but can be characterized as a modern interpretation of Spanish architecture.

1.1 Project Location and Limits

The Project site is located in Section 33, Township 5 South, Range 7 East, San Bernardino Baseline and Meridian. The Project site is located on the north side of Avenue 50 between Jefferson Street and Madison Street in the City of Indio, Riverside County, California. The subject and surrounding lands are shown on the United States Geological Survey (USGS) 7.5-minute La Quinta, California quadrangle. Also, please see Exhibits I-1: Regional Location Map, I-2: Vicinity Map, I-3: Project Location Map and I-4: Project Site Plan (TTM 37884). Assessor's Parcels involved include 602-070-004-1, 602-080-001-9, and 602-080-002-0.

1.2 Purpose and Need

The purpose of this EIR is two-fold. The EIR tiers off the General Plan EIR, certified by the City on September 18, 2019, and analyzes the impacts associated with the creation of a new land use designation that would allow up to three units per acre. This designation would be applied to the proposed Project site, and result in an increase from 45 dwelling units to 136 dwelling units for the Project site. The analysis relating to the General Plan Amendment (both text and map) analyzes the impacts associated with the build out of the General Plan, as analyzed in the General Plan Program EIR, and considers the impacts the GPA will have on this build out. As a Program EIR, the General Plan EIR considered the policies and programs of the General Plan, and their relative ability to mitigate the impacts of build out. This tiered EIR considers the application of these policies and programs as they relate to the GPA, to determine whether the proposed GPA would increase, decrease or be equivalent to the impacts described in the General Plan EIR.

In addition to the change proposed in the General Plan, the Project will result in the implementation of a Specific Plan which allows 103 new housing units on currently vacant land in the City of Indio. The direct and indirect impacts of the Project on the environment are also analyzed in this document. Based on consideration of the policies and programs the Project will be subject to, and the analysis of physical impacts to the site, as well as cumulative and indirect impacts, site-specific mitigation measures have been identified and described throughout the EIR to reduce potentially significant impacts to less than significant levels. As such, this EIR acts as a Project-level document that addresses build out of the Specific Plan, Tentative Tract Map and Design Review.

1.3 Statement of Project Objectives

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

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

The project objectives identify the purpose of the Project. The City has identified the following list of objectives for the Project.

- Provide a bridge and buffer between the rural atmosphere of the Desert Estates and more urban Suburban Neighborhoods.
- Provide a range of residential densities that allow a broad range of housing for all segments of Indio's population.
- Provide diverse products of modern, energy efficient single-family homes in a planned community.
- Provide neighborhood parks, community gathering spaces, passive parks and/or dog parks within the neighborhood, consistent with the General Plan's vision for a more connected community.
- Expand housing inventory for City residents.



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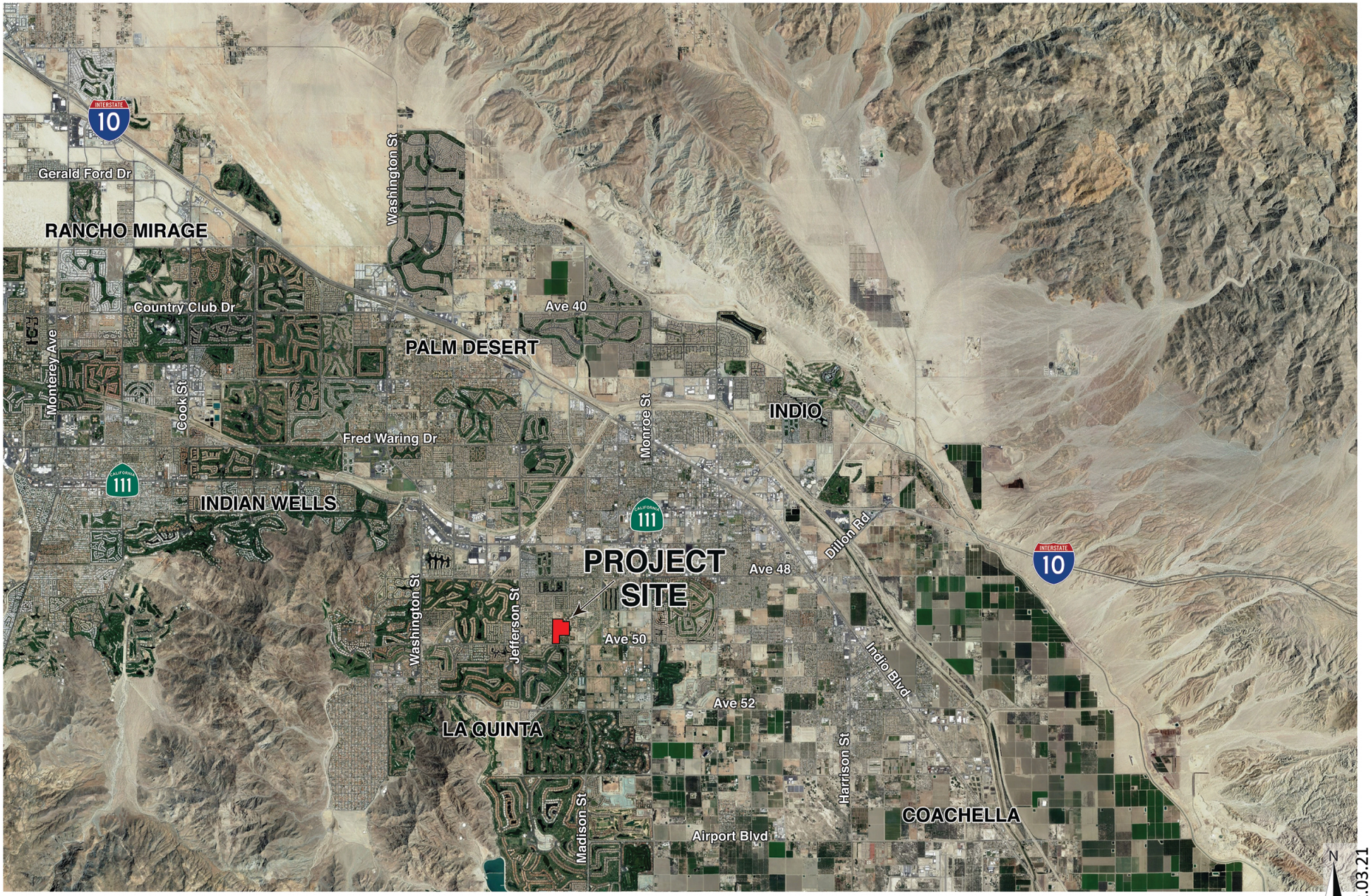
VENTANA Specific Plan EIR
Regional Location Map
Indio, California

Exhibit
1-1



Source: Google Maps, 2019

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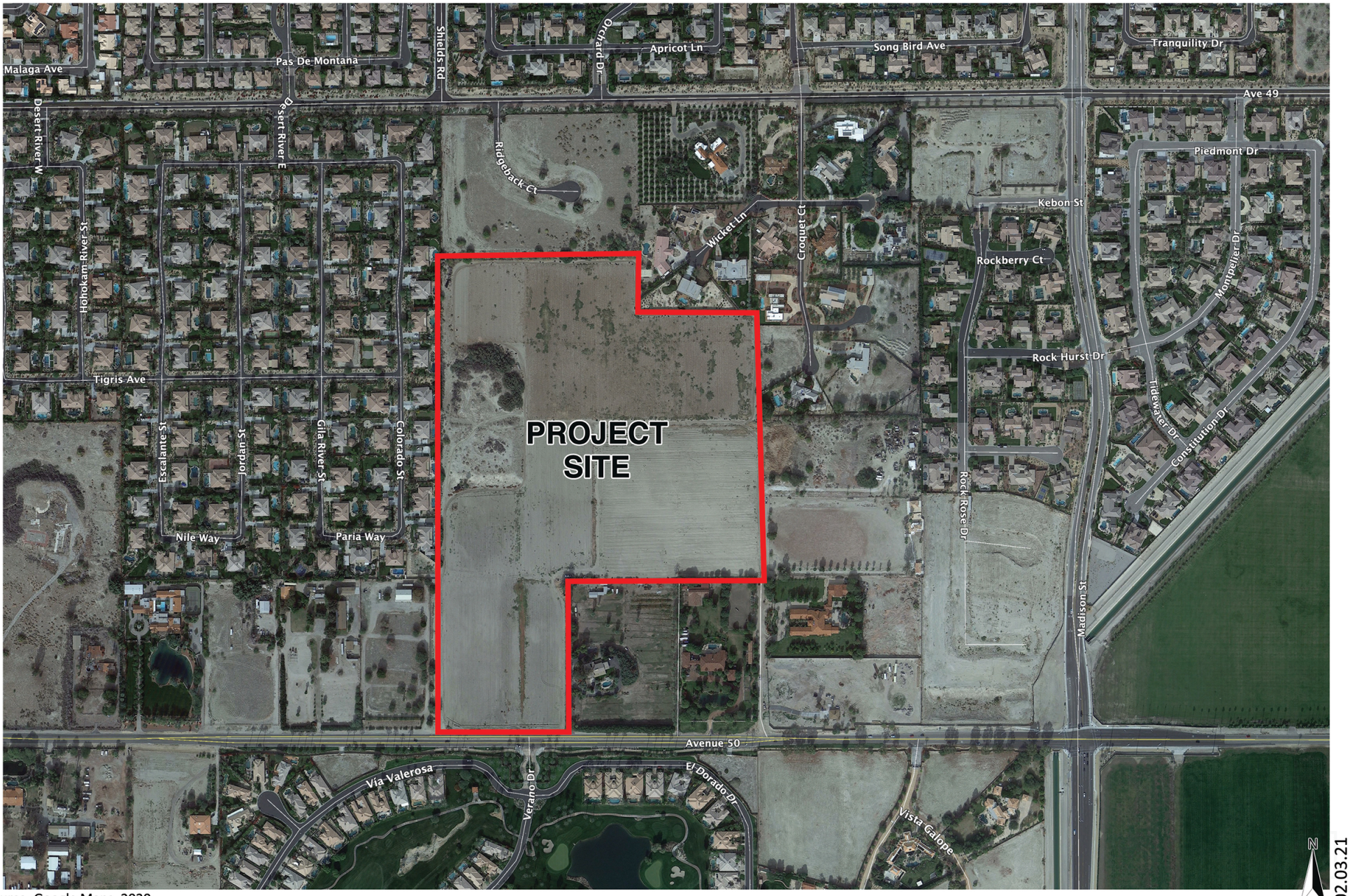
VENTANA Specific Plan EIR
Vicinity Map
Indio, California

Exhibit
1-2



Source: Google Maps, 2020

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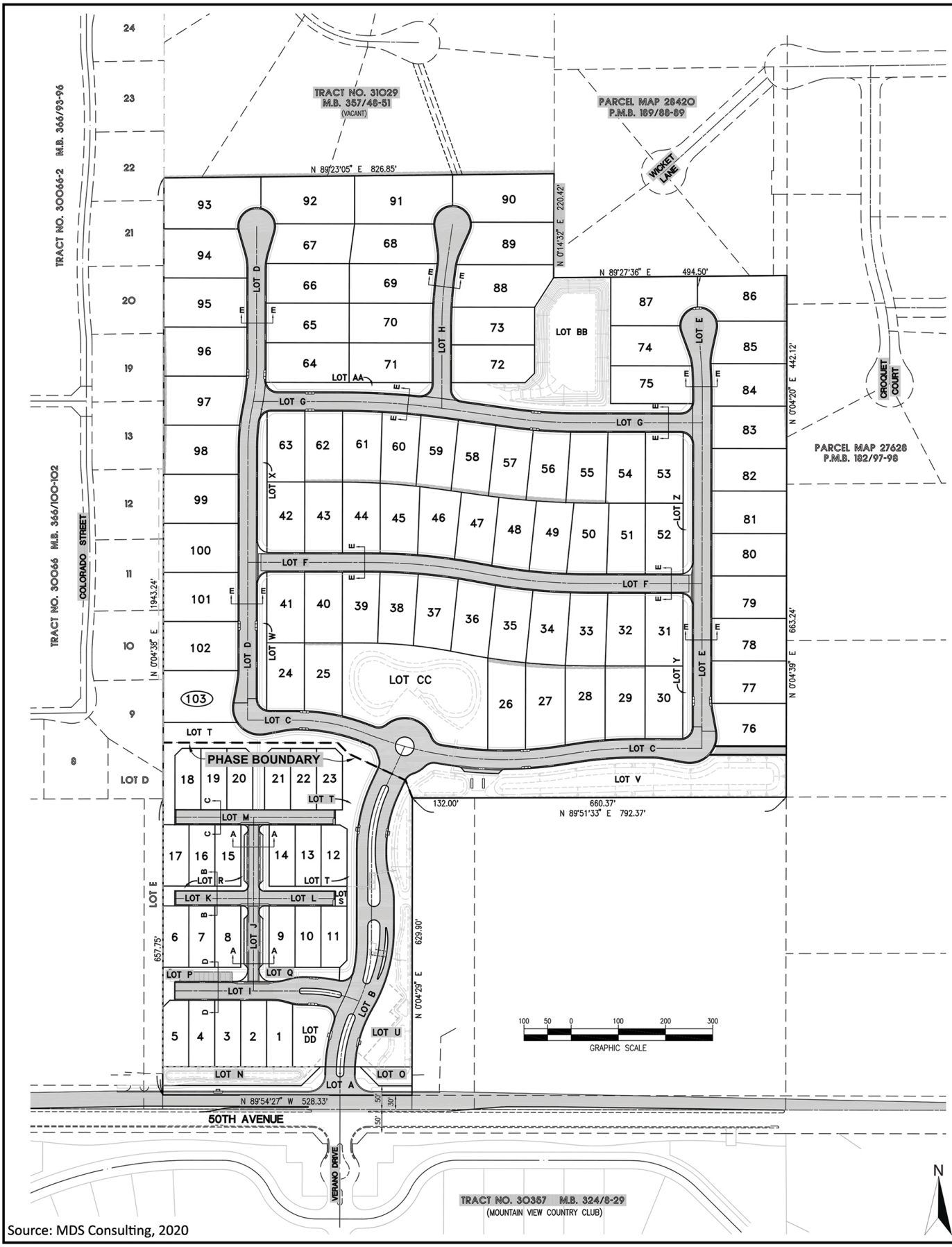
VENTANA Specific Plan EIR
Project Location Map
Indio, California

Exhibit
1-3



Source: MDS Consulting, 2020

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VENTANA Specific Plan EIR
Project Site Plan (TTM 37884)
Indio, California

Exhibit
1-4



Source: MDS Consulting, Terra Nova Planning, 2020

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VENTANA Specific Plan EIR
Planning Areas Map
Indio, California

Exhibit
1-5

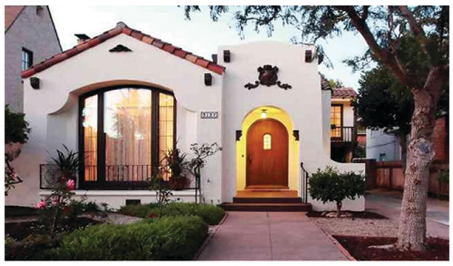
NEIGHBORHOOD

Transitional Neighborhood

Provides a bridge and buffer between the rural atmosphere of the Desert Estates, and Suburban Neighborhoods.

Allowed Land Uses

+ Primary: Single-family residential, parks and recreation
+ Secondary: Public facilities, hospitality



Allowed Development Intensities

+ DU/AC: Up to 3.0
+ Commercial FAR: N/A



Streetscape

Streetscapes are simple, with rolled curbs and sidewalks and trails that facilitate internal connectivity. Street alignments are curvilinear, with adjacent open spaces. The vehicular design speed is 25 mph.

Connectivity

Streets are internally oriented. Blocks are pedestrian-oriented and include sidewalks and pathways to connect residents to parks, open space and community amenities. Streets are interconnected to create a comfortable neighborhood feel.

Open Space

Neighborhood parks, community swimming pools, passive parks and dog parks are provided within the neighborhood, without having to access collector or larger roadways. Parks are integral to the community.

Building Form and Character

Traditional lotting arrangements that allow flexibility in lot sizes, from 7,000 square foot to ½ acre in size within the same community, to promote diversity. Variety in lot size and product type is encouraged, as is density averaging. Back yards are large enough for private pools and other private open space for each household. Homes should be primarily one-story, with second story pop ups over no more than 50% of the ground floor area.

02.03.21

Source: Terra Nova Planning, 2020; City of Indio 2040 General Plan

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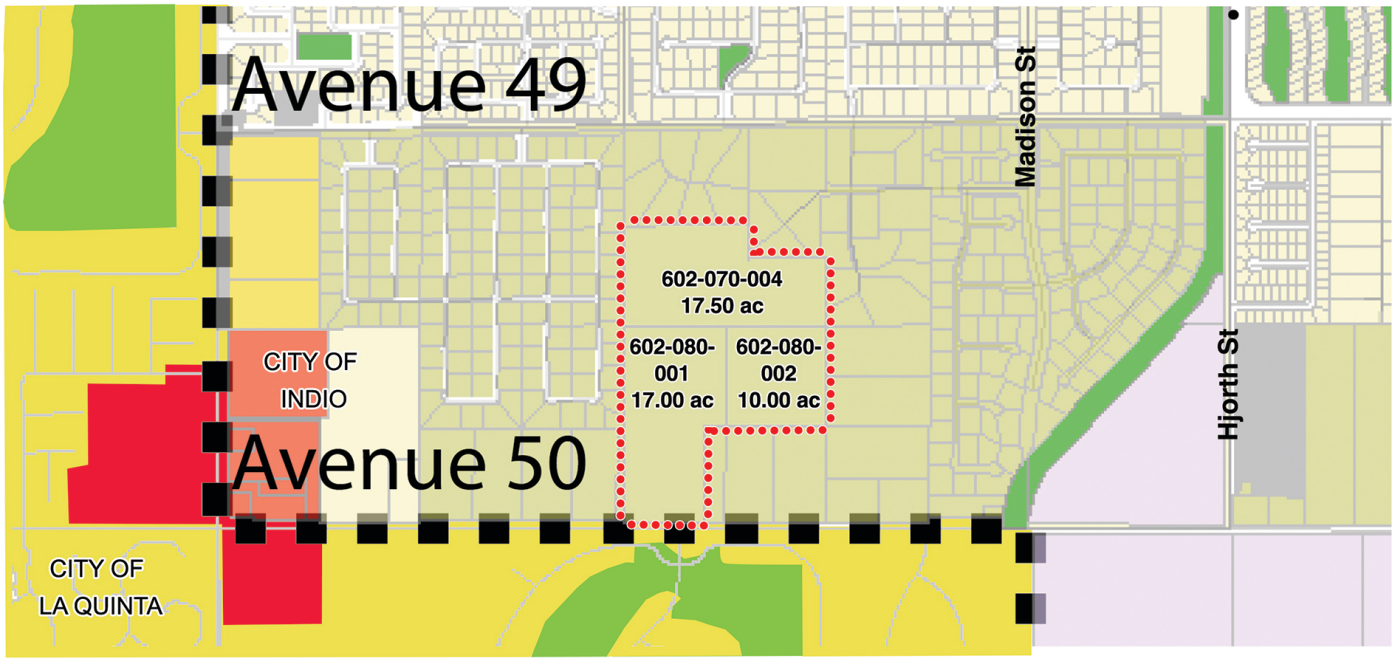
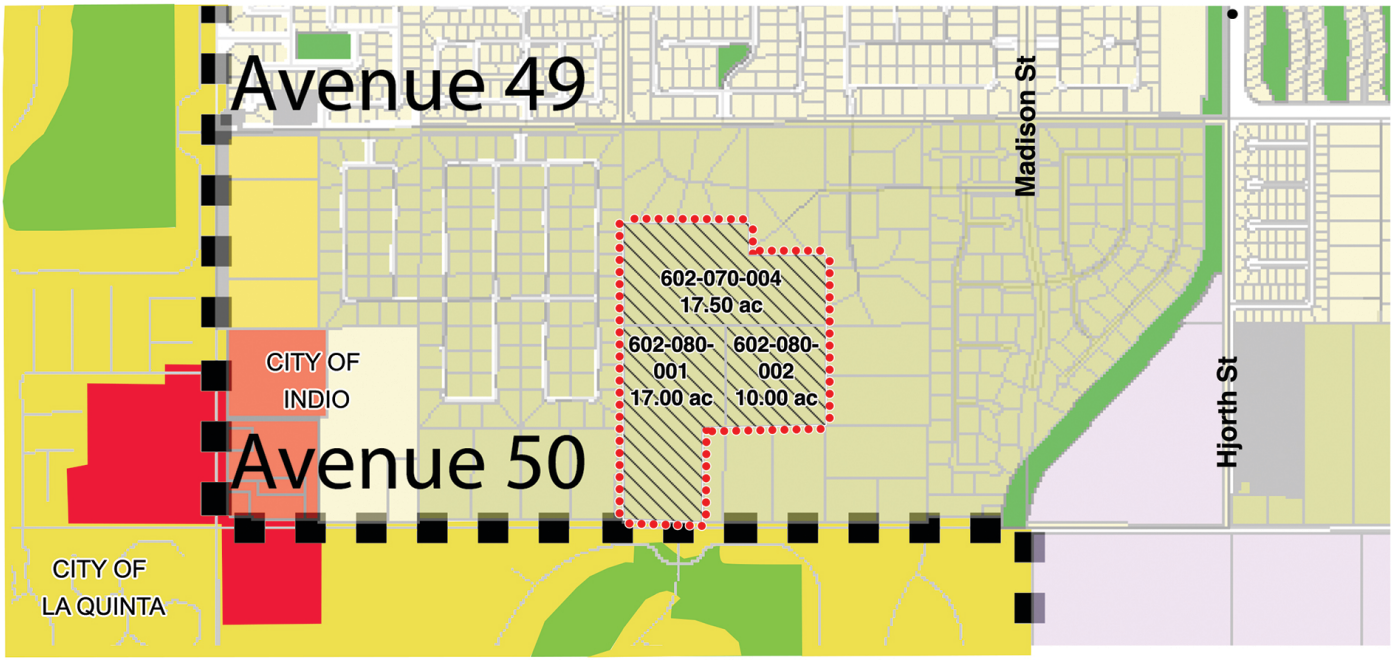
VENTANA Specific Plan EIR
Transitional Neighborhood Text
Indio, California

Exhibit
1-6

Existing General Plan Land Use Map



Proposed General Plan Land Use Map



Indio GP Land Use:
- Festival District
- Public and Institutional
- Parks and Open Space
- Neighborhood Center
- Desert Estate Neighborhood
- Suburban Neighborhood
- Connected Neighborhood
- Transitional Neighborhood

La Quinta GP Land Use:
- General Commercial
- Low Density Residential
- Open Space - Recreation

- City Boundary
- Project Boundary

N

02.03.21

Source: Indio 2040 General Plan; La Quinta 2035 General Plan; Terra Nova Planning, 2020

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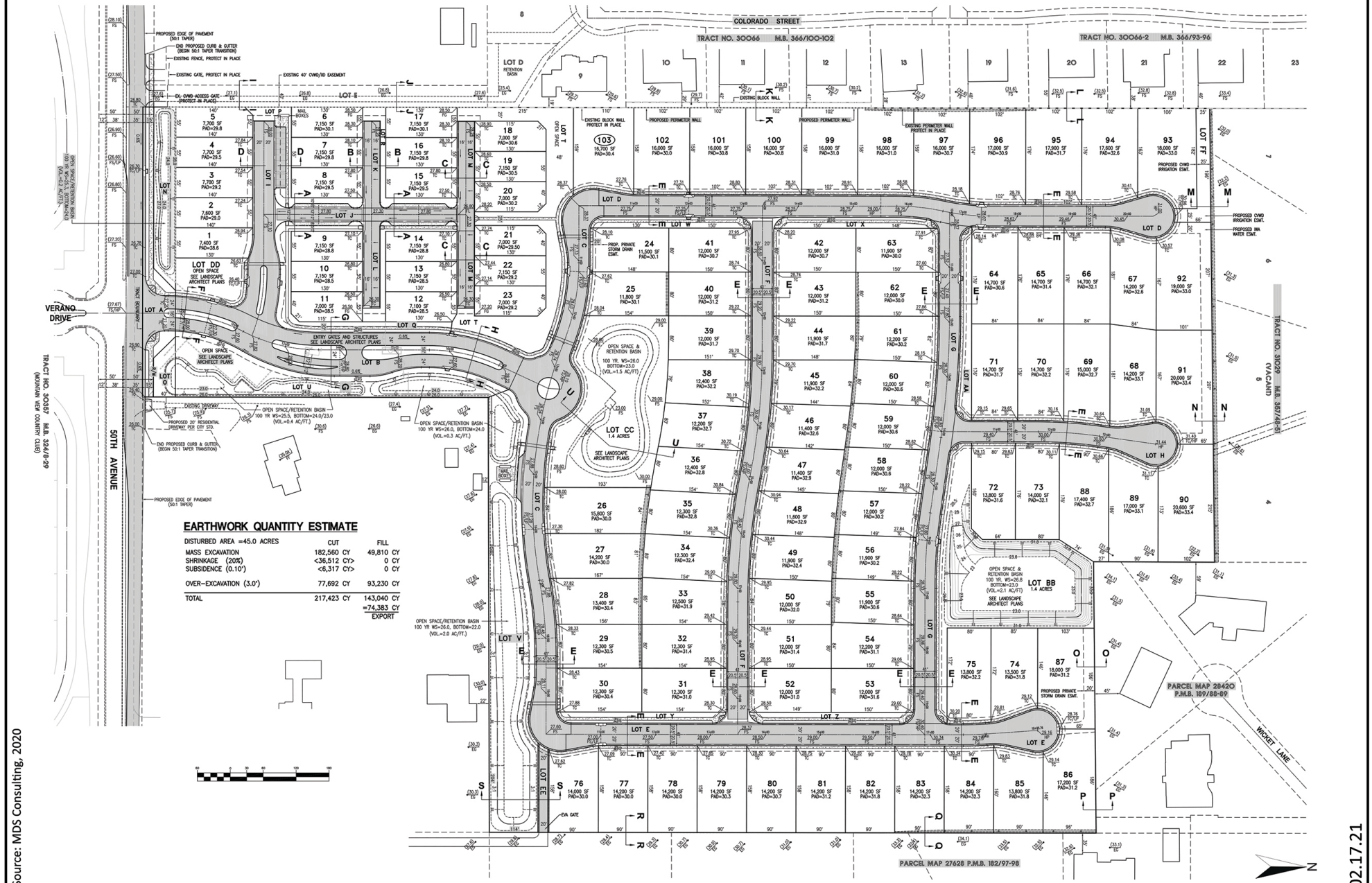
VENTANA Specific Plan EIR
General Plan Amendment
Indio, California

Exhibit
1-7



Source: MDS Consulting, 2020

02.17.21

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VENTANA Specific Plan EIR
Tentative Tract Map and Grading Plan
Indio, California

Exhibit
1-8

1.4 CEQA Process

California Environmental Quality Act

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

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

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

1.4.1 Notice of Preparation

The first step in the development of an EIR is conducting a preliminary assessment of the project and the issuance of a Notice of Preparation (NOP) of an Environmental Impact Report to solicit input from agencies and other parties of interest, including the general public.

The NOP was released on January 7, 2021, and the 30-day public review period concluded on February 8, 2021. Per CEQA Guidelines Section 15082(c), a scoping meeting was not required for the Project because it is not of statewide, regional or areawide significance.

The NOP (see Appendix A) was submitted to the Riverside County Clerk for 30-day posting. The NOP was also submitted to the State of California Governor's Office of Planning and Research, State Clearinghouse (SCH), which circulated the NOP to state agencies for a 30-day review and comment period. A public notice was also published in the Desert Sun, a newspaper of general circulation, on January 7, 2021. Comment letters were received from the Native American Heritage Commission, the South Coast Air Quality Management District, Mr. Tom Moon, Mr. and Mrs. Kyle, and Mr. and Mrs. Guth (see Appendix A).

Comments related to proper coordination with Native American Tribes; standards relating to air quality analysis; and concerns regarding the Project's impacts on scenic vistas and emergency access. The agencies/districts/parties who provided comments will receive proper notification and Draft EIR materials to review during the public comment period process.

1.4.2 Draft EIR

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

1.4.3 Final EIR

Following the public review and comment period, the City will prepare written responses to the written comments received on the Draft EIR. Where necessary, the Draft EIR may be revised, as appropriate, and together with the Response to Comments, will constitute the Final EIR. In accordance with State CEQA Guidelines Sections 15090-15097, the Indio City Council will be the final authority certifying the Final EIR during a noticed public hearing.

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

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

1.4.4 Mitigation Monitoring and Reporting

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

1.4.5 Organization of the Draft EIR

The organization of the Draft EIR is as follows:

Environmental Matrix - Summary of Project, Impacts and Mitigation

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

Section 2 – Environmental Setting, Impacts and Mitigation Measures. The environmental setting discussion provides important background data and information on all CEQA analysis categories on a regional and area-wide basis. This section of the EIR serves to establish the physical context within which the Project is being considered and analyzed. It also presents the physical and regulatory setting by environmental resource category, identifies impact significance criteria, and analyzes potential impacts of the Project, including potential cumulative impacts. Mitigation measures and monitoring and reporting programs are identified, where applicable. Section 2 analyzes the following resource areas:

- Introduction (Section 2.1)
- Summary of Environmental Impact Analysis (Section 2.2)
- Aesthetics (Section 2.3)
- Agricultural and Forestry Resources (Section 2.4)
- Air Quality (Section 2.5)
- Biological Resources (Section 2.6)
- Cultural Resources (Section 2.7)
- Energy (Section 2.8)
- Geology and Soils (Section 2.9)
- Greenhouse Gas Emissions (Section 2.10)
- Hazards and Hazardous Materials (Section 2.11)
- Hydrology and Water Quality (Section 2.12)
- Land Use and Planning (Section 2.13)
- Noise (Section 2.14)
- Population, Housing and Socio-Economic Resources (Section 2.15)
- Public Services (Section 2.16)
- Recreational Resources (Section 2.17)
- Transportation and Traffic (Section 2.18)
- Tribal Cultural Resources (Section 2.19)
- Utilities and Service Systems (Section 2.20)

Impact Categories Not Further Analyzed

The Initial Study prepared for the Notice of Preparation and this EIR[1] evaluated each of the analysis categories set forth in Appendix G of the CEQA Guidelines. Two CEQA analysis categories were determined to be not impacted by development of the proposed Project.

[1] See Appendix A of this Draft EIR.

These include *Mineral Resources* and *Wildfire*. There are no permitted mining operations nor land zoned for mineral resource extraction in the Project vicinity. The Project area lies well outside any identified wildfire hazard zone. These two analysis categories are not further analyzed in this EIR.

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

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

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

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

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

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

1.5 Responsible and Cooperating Agencies

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

1.6 Project's Relationship to Other Plans

Regional Plans

The proposed Project is related to or must accommodate other plans developed in the City and Coachella Valley. These include the Coachella Valley Multiple Species Habitat Conservation Plan (CVMSHCP), the South Coast Air Quality Management District Air Quality Management Plan (AQMP), and the Coachella Valley PM_{10} State Implementation Plan.

Local Plans

Local plans taken into consideration include the City of Indio General Plan 2040 and the City of Indio Climate Action Plan. The Project proposes a General Plan Amendment (GPA) that would create a new residential land use designation which would be applied to the Project site, "Transitional Neighborhood", that allows a residential density of up to 3 DU/AC. The GPA proposes amendments to both the General Plan text and the land use map. As a result, this EIR tiers off of and relies on the General Plan Environmental Impact Report (GPU EIR) in its analysis of the proposed General Plan Amendment.

1.7 Permits, Approvals, Easements

The City is the CEQA Lead Agency and is empowered with regulating land use and other activities within its corporate boundaries. The Project is a discretionary permitting process that culminates in the processing and approval of a General Plan text and map Amendment, conforming Specific Plan, Tentative Tract Map and Design Review. The subject EIR is also used by the City and may be used by others to authorize the issuance of roadway encroachment permits, demolition permits, grading and building permits, and other authorizations.

1.8 Project Alternatives

Section 3, Project Alternatives Analysis, evaluates two alternatives to the proposed Project, and evaluates the comparative merits of each alternative. Potential environmental impacts associated with each alternative evaluated in Section 3 are compared to the impacts of the VENTANA Project. The alternatives are Alternative 1: No Project/Existing General Plan, and Alternative 2: Suburban Neighborhood. The alternatives were developed to avoid or minimize impacts associated with implementation of the proposed Project, and in consideration of existing General Plan land use designations.

Alternative 1: No Project/Existing General Plan. As required by CEQA Guidelines Section 15126.6(e), the No Project/Existing General Plan Alternative describes buildout of the Project area consistent with the existing General Plan land use designation. Alternative 1 assumes the site will be built out at 1 DU/AC, the maximum density allowed by the current "Desert Estates Neighborhood" designation in the City's 2040 General Plan, and would result in 45 single family dwelling units.

Alternative 2: Suburban Neighborhood. Alternative 2 would include a General Plan Amendment which changes the designation of the site to Suburban Neighborhood, the existing land use designation which currently exists in the General Plan. The Suburban Neighborhood designation allows 0-8 units per acre, and is the next density range currently available in the City's General Plan. Under this alternative, up to 361 residential units could be constructed. For purposes of this analysis, and based on the need for common area open space, parking and retention areas, it has been assumed that the units would be attached condominiums, townhomes or apartments. This alternative would still be accessed from Avenue 50.

1.9 Other Alternatives Considered but Not Further Analyzed

Two other alternatives were considered for the proposed Project, but rejected. An alternative which would allow 0-2 units per acre, or a total of 91 units, consistent with the density of the existing Desert River Estates project, was considered. It was rejected because it would not meet most of the project objectives, and would not be allowed under current General Plan land use designations. The Alternative Site alternative was also considered, but no alternative site was available for sale, or met the Project objectives in this area of the City.

CITY OF INDIO
VENTANA SPECIFIC PLAN

DRAFT
ENVIRONMENTAL IMPACT REPORT

2. ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

2.1 Introduction

This section of the EIR provides an overview of the regional environmental setting in which the proposed VENTANA Specific Plan is located, the impacts resulting from the implementation of the Project, and the mitigation measures required to reduce these impacts to less than significant levels. As prescribed by CEQA, the analysis is conducted on a categorical basis. Each discussion includes a description of the thresholds of significance considered in the analysis, regulatory framework, environmental setting, and existing conditions in the Project area.

These discussions are followed by an analysis of the impacts of the proposed Project, including a determination of the level of impact (less than significant, less than significant with the implementation of mitigation measures, or significant and unavoidable). All discussions include an analysis of the proposed General Plan Amendment and a separate analysis of the proposed Specific Plan, Tentative Tract Map and Design Review. All analysis is tiered from the General Plan EIR (GPU EIR), and considers the discussions in that document in the context of the proposed Project.

Mitigation measures are provided where necessary to reduce impacts to the greatest extent possible. Should feasible mitigation measures not be possible, or should the feasible mitigation measures not reduce the impacts of the Project to less than significant levels, the impact would be determined to be significant and unavoidable.

2.2 Summary of Environmental Impact Analysis

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

- Aesthetics in Section 2.3
- Agricultural and Forestry Resources in Section 2.4
- Air Quality in Section 2.5
- Biological Resources in Section 2.6
- Cultural Resources in Section 2.7
- Energy Resources in Section 2.8
- Geology and Soils in Section 2.9
- Greenhouse Gas Emissions in Section 2.10
- Hazards and Hazardous Materials in Section 2.11
- Hydrology and Water Quality in Section 2.12
- Land Use and Planning in Section 2.13
- Noise in Section 2.14
- Population, Housing and Socio-Economic Resources in Section 2.15
- Public Services in Section 2.16
- Recreational Resources in Section 2.17
- Transportation and Traffic in Section 2.18
- Tribal Cultural Resources in Section 2.19
- Utilities and Service Systems in Section 2.20

As analyzed in the Initial Study/Notice of Preparation, the Project will not impact *Mineral Resources* and *Wildfire*, therefore, these two sections will not be discussed further in the EIR. Individual questions within each of the above subsections for which No Impact was determined in the Initial Study/Notice of Preparation are identified individually in each subsection of Section 2.

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

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

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

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

Impacts and Mitigation Measures: This subsection analyzes the specific impacts of the proposed Project on each question provided in Appendix G of the CEQA Guidelines, as amended in 2020. The analysis focuses on the proposed General Plan Amendment and the VENTANA Specific Plan. Where necessary, mitigation measures are included to reduce identified significant impacts to less than significant levels to the greatest extent possible.

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

2.3 Aesthetics

2.3.1 Introduction

The discussion of aesthetic resources under CEQA assesses the impacts of a proposed project on the scenic quality of the location in which it occurs. Aesthetic impacts could occur if a proposed project, either during its construction or operation, would alter the scenic vistas or visual character of the area as viewed from the public realm. This section also addresses the impacts of a project from light and glare emitted from a project during and after its construction.

2.3.2 Thresholds of Significance

Based on Appendix G of the 2018 State CEQA Guidelines, impacts related to aesthetics would be significant if the Proposed Project would:

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

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

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

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

The Initial Study determined that the Project would result in “No Impact’ for threshold question b) above. Therefore, it is not analyzed further in this EIR.

2.3.3 Regulatory Framework

Federal
There are no applicable federal standards relating to aesthetics that will be affected by the proposed project.

State

California Scenic Highway Program

The State of California established the Scenic Highway Program in the 1960s to develop a system of State roadways whose adjacent corridors contained scenic resources worthy of protection and enhancement. Sections 260 through 263 of the State Streets and Highways Code establish the Scenic Highways Program and require local government agencies to take the following actions to protect the scenic appearance of a scenic corridor:

- regulate land use and density of development,
- provide detailed land and site planning,
- prohibit off-site outdoor advertising and control onsite outdoor advertising,
- pay careful attention to and control earthmoving and landscaping, and
- scrutinize the design and appearance of structures and equipment.

Regional/Local

City of Indio General Plan

The Indio General Plan includes a number of policies that relate to scenic vistas, scenic resources, visual character and light and glare, as follows:

Policy LU-1.4 Connecting New and Old. Connect new growth areas with existing Indio neighborhoods through transportation investments, open space connectivity, wayfinding, and urban design strategies.

Policy LU-1.3 Contiguous Development. When development occurs outside the Downtown, Midtown, and existing central neighborhoods, locate new development adjacent to Indio's built environment to create a contiguous expansion of the City.

Policy LU-1.5 Subareas. Implement the strategies identified for each distinct subarea in Indio in this General Plan.

Policy LU 3.1 Streetscape Design. Create pedestrian-oriented streetscapes by establishing a unified approach to street tree planting, sidewalk dimensions and maintenance, pedestrian amenities, and high-quality building frontages.

Policy LU-4.1 Quality Design. Use simple, urban building forms made with permanent materials with high-quality detailing that stands the test of time.

Policy LU-4.2 Scale and Articulation. Use building organization and construction to derive scale and articulation rather than surface ornamentation.

Policy LU-4.3 Building Materials. Convey façade articulation through the strength, depth, and permanence of building materials. Thinner cladding materials, such as stucco, stone and masonry veneers, and wood or simulated wood, may be used when finished to appear as durable and authentic of the materials they simulate.

Policy LU-4.4 Building Entrances. Use visual and physical design cues within a building's design and entries to emphasize the building entrance and connections to public spaces.

Policy LU-4.5 Iconic Design. Allow iconic and memorable building designs, particularly on larger non-residential properties.

Policy LU-4.6 Climate-Appropriate Design. Encourage the use of building techniques and materials that relate to Indio's warm and dry desert climate. Promote solar control and use of shade in building design and associated pedestrian amenities.

Policy LU-4.7 Protect Visual Characteristics. Protect Indio's unique visual characteristics and views.

Policy LU-6.7 Compatible Scale. Maintain high-quality existing residential neighborhoods by ensuring new development projects and infill construction are of a compatible scale and provide adequate transitions to adjacent residential properties.

Policy LU-8.3 Resort Connectivity and Streetscape. Require streetscape design and street connectivity be consistent with the character and standards identified by the General Plan placetype in which the resort parcel or project is located. Pedestrian access to perimeter streets or adjoining neighborhoods or districts should be provided approximately every 600 feet to encourage walking, biking, or equestrian activity.

Policy CE-7.6 Native Plants. Incorporate native desert plant materials into new development projects to the extent possible and feasible.

City of Indio Municipal Code

The City's Municipal Code includes Section 97.069, which provides standards and requirements for lighting in landscaped areas of projects. Regulations related to lighting in parking areas are also provided in Section 159.653, which requires that parking area lighting be shielded and not be allowed to spill over to other properties.

2.3.4 Environmental Setting

The City of Indio, including the Project site, is located in Coachella Valley, which is a desert valley that extends approximately 45 miles in Riverside County, southeast from the San Bernardino Mountains to the northern shore of the Salton Sea.

The Project site occurs in an urban environment, near the City's southwestern boundary with the City of La Quinta. The current urban environment includes single family homes, a mobile home park, several fully developed and functioning neighborhoods, community and regional shopping centers, and major roadways. The site represents an irregularly shaped property in an infill area, surrounded by the following:

North: An approved, partially developed (interior cul-de-sac and perimeter improvements) single family subdivision of 8 lots on approximately 11 acres and existing single family homes on 1-acre lots. Beyond these properties is Avenue 49 and fully developed residential subdivisions, generally on ½ acre lots.

South: Avenue 50 occurs on the western half of the Project's southern boundary. Beyond Avenue 50, an existing country club development, consisting of single family homes surrounding a golf course is fully developed, and located in the City of La Quinta. On the eastern half of the Project's southern boundary are two single family homes on lots of 7± and 5± acres, respectively.

East: Land east of the property include existing single family homes on 1-acre lots northeast and east of the site, and irregularly developed 5 acre lots which include single family homes and outdoor storage areas. Beyond these lands are developed single family subdivisions west of Madison Street, on ½ acre lots.

West: Lands to the west include a Coachella Valley Water District access road and single family homes on 5± acre lots along the southern 600± feet of the Project site, and a fully developed single family subdivision on ½ acre lots along the northerly 1,300± feet of the west boundary.

The broader area in which the Project is located includes Jefferson Street and the existing Citrus Plaza neighborhood shopping center approximately 2,500 feet west of the Project site, and Madison Street, polo fields and the festival grounds approximately 2,200 feet east of the Project site.

2.3.5 Existing Conditions

The San Bernardino, San Jacinto and Santa Rosa mountain ranges provide scenic views throughout the City. The San Bernardino range extends to the north of the City, and its foothills are within the City's Sphere of Influence. The San Jacinto range is located to the northwest of the City, and the Santa Rosas occur to the south and southwest of the City.

From the subject property, scenic views of the San Bernardino Mountains are to the north and east, and views of the Santa Rosa Mountains are to the south and west. The Project site is located approximately 1.81 miles northeast of the Santa Rosa Mountain foothills and approximately 6.01 miles southwest of the San Bernardino Mountain foothills. The site is located on the valley floor and views of the lower elevations of the mountains are blocked by intervening development in all directions. However, middle and upper elevations of the mountains are visible above.

The Project site is currently vacant and bounded by Avenue 50 and low-density residential development to the south, and a mix vacant lands and low-density residential development to the north, east and west. Structures on these properties are primarily one-story and two-story single-family homes consistent with other urban development in the area in scale and height. The site is generally flat, with a man-made mound located along the western edge of the property, at its mid-point. Perimeter walls and landscaping occur along the property's boundaries on all sides where development currently exists. Avenue 50, along the southern edge of the Project site, is fully developed on its south half in the City of La Quinta, and fully paved but partially developed on the property boundary.

There are no state-designated scenic highways in proximity to the Project site. The nearest eligible, but undesignated scenic roadways under Riverside County's General Plan are Dillon Road and Interstate 10, located more than 4 miles north of the subject property.

2.3.6 Project Impacts

The proposed Project includes a General Plan Amendment from the Desert Estates Neighborhood (Up to 1 DU/acre) to a new designation, Transitional Neighborhood, which would allow up to 3 units per acre. The VENTANA Specific Plan, Tentative Tract Map and Design Review would result in the development of 103 single family homes as well as streets, pedestrian facilities, common area open space, recreation and retention basins. Single family homes in Planning Area 1 would be limited to 28 feet in height, and would result in a mix of 1 and 2 story homes in the southwestern portion of the site. Planning Area 2 would consist of 1 story homes on the balance of the site. Planning Area boundaries are shown in Exhibit 1-5. Elevations for the various home models are shown in Exhibits 2.3-1 and 2.3-2.





Source: KTGY Architecture + Planning, 2020

02.16.21

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VENTANA Specific Plan EIR
Typical Street Scenes
Indio, California

Exhibit
2.3-1

LEGEND *(SPANISH COLONIAL 'B')*

1. Stucco, Light Sand Finish (Smooth)
2. Low Profile Concrete "S" Roof Tile (20% Boosted)
3. Gable End Faux Vent Square Recesses
4. Recessed Wood Trim Header
5. Recessed Wood Beam/Trim (Wrap as needed)
6. Brick Veneer Sill Trim
7. Stucco Recess /Reveal at Windows/Doors
8. Stucco Finial with Fiberglas Prefab Decorative Top Detail
9. Color Integral Aluminum Windows with Muntins
10. Color Integral Aluminum Patio Doors
11. Transom Windows/Clear-story Windows
12. Stucco Recess at Windows/Doors
13. Exposed Rafter Decorative Tails with 2x3 Wood Fascia Bd.
14. Exposed Truss Tails with Radius Ends and 2x3 Wood Fascia Bd.
15. 2x6 Barge Board
16. Stucco Arched (Soffit) with Battered Detail
17. Low Stucco/Brick "Barranca" Top (Slope to Drain)
18. Decorative Entry Doors
19. Decorative Exterior Lights & Address Sign (Raised Pin Numbers at Large Estates/ Frame Metal Letters at Small Estates)
20. Wood Sectional Garage Door
21. W.I. Grille Work with Decorative Scrolls at Gates/Grilles
22. Decorative Vert. Slatted Shutters with Faux Hardware
23. Stucco Battered/ Sloped Wing Wall



FRONT 23 20 19 18 9



RIGHT 6



REAR 10



LEFT

02.03.21

Source: KTGY Architecture + Planning, 2020

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VENTANA Specific Plan EIR
PA 1 Typical Elevations - Spanish Colonial Style
Indio, California

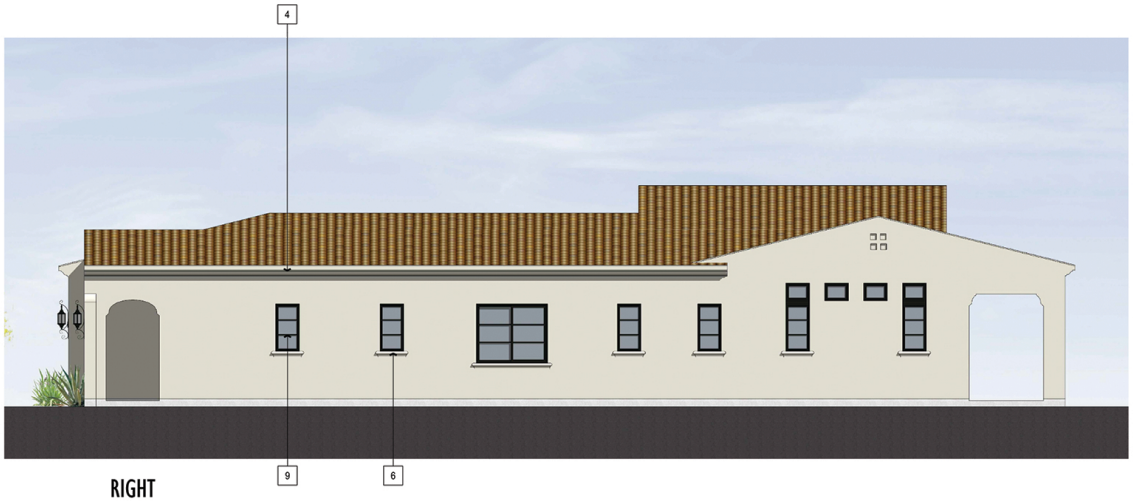
Exhibit
2.3-2

LEGEND *(SANTA BARBARA 'A')*

1. Stucco, Light Sand Finish (Smooth)
2. Low Profile Concrete "S" Roof Tile (20% Boosted)
3. Gable End Faux Vent Recesses
4. Stucco Over Foam Eave
5. Stucco Scalloped Sill Trim
6. Stucco Scalloped Hood with Corbels
7. Stucco Recess /Reveal at Windows/Doors
8. Stucco Finial with Recesses
9. Color Integral Aluminum Windows with Muntins
10. Color Integral Aluminum Patio Doors
11. Transom Windows/Clear-story Windows
12. Stucco over Foam Decorative Eave
13. Stucco Arched (Soffit) with Battered Detail
14. Stucco Arched (Soffit) with Stucco Corbels
15. Stucco Over Foam Corbels
16. Fiberglas Prefab 3/4 Round Doric Column
17. Low Stucco "Barranca" with Paver Tile Caps (Slope to Drain)
18. Decorative Entry Doors
19. Decorative Exterior Lights & Address Sign (Raised Pin Numbers at Large Estates/ Frame Metal Letters at Small Estates)
20. Wood Sectional Garage Door
21. W.I. Grille Work with Decorative Scrolls at Gates/Grilles
22. Decorative Shutters with Metal Calvos and Faux Hardware
23. Stucco Battered/ Sloped Wing Wall
24. Recessed Decorative Tile Niche
25. Recessed Stacked Decorative Paver Tile Grille



FRONT



RIGHT



REAR



LEFT

02.03.21

Source: KTGY Architecture + Planning, 2020

TERRA NOVA®
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VENTANA Specific Plan EIR
PA 2A Typical Elevations - Santa Barbara Style
Indio, California

Exhibit
2.3-3

LEGEND *(SPANISH MODERN 'C')*

1. Stucco, Light Sand Finish (Smooth)
2. Low Profile Concrete "S" Roof Tile (20% Boosted)
3. 2" Stepped Modern Cornice at Parapets
4. Stucco Over Foam Eave
5. Color Integral Aluminum Windows
6. Color Integral Aluminum Patio Doors
7. Transom Windows/Clear-story Windows
8. Stucco Recess at Windows/Doors with Tight Foam Inserts
9. Stucco Battered Openings
10. Stucco Chamfered Corner Openings
11. Stucco Built Eyebrows with Copper Top (Slope to Drain)
12. Stucco Decorative Diamond Shaped Faux Grille Work
13. Decorative Wood Gate Doors
14. Decorative Entry Doors
15. Decorative Exterior Lights & Address Sign (Raised Pin Numbers at Large Estates/ Frame Metal Letters at Small Estates)
16. Wood Sectional Garage Door with Glass Panels



FRONT



RIGHT



REAR



LEFT

02.03.21

Source: KTGY Architecture + Planning, 2020

TERRA NOVA®
PLANNING & RESEARCH, INC.

VENTANA Specific Plan EIR
PA 2B Typical Elevations - Spanish Modern Style
Indio, California

Exhibit
2.3-4

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

General Plan Amendment

The General Plan would currently allow 45 single family homes on the Project site. The General Plan Amendment would result in up to 136 single family homes, a difference of 91 units. The General Plan EIR (GPU EIR) determined that implementation of the General Plan would have a less than significant impact on public views and scenic vistas, with the application of General Plan policies. The General Plan Amendment does not propose to modify General Plan goals and policies, and development under the General Plan Amendment would be governed by the same policies as all other development in the City. The General Plan Amendment will implement Policy LU-1.3, and locate development contiguous to existing development. The General Plan Amendment will also implement Policy LU-1.5, and implement the strategies identified in the Southern Neighborhoods subarea, by developing a parcel of at least 20 acres in size through a master plan, and improving multi-modal access to the Festival District through full street improvements on Avenue 50.

The development allowed under the General Plan Amendment would be limited to single family development of one and two stories, as would development under the current Desert Estates land use designation. Development intensity would increase, as homes would be necessarily located closer together. Under either General Plan designation, a master planned community would be expected, including full roadway improvements on Avenue 50, parkway landscaping and a perimeter wall, consistent with the existing developments surrounding the Project site. The public views from the Project site would not change substantially with implementation of the General Plan Amendment, insofar as the primary view from Avenue 50 would be of parkway improvements and a wall. Further into the property, the General Plan Amendment would result in greater massing, insofar as homes would be located closer together. However, under both existing and proposed land use designations, and consistent with Policy LU-4.7, the views of the surrounding mountains would remain above the homes' rooftops to the north, northwest and northeast. Finally, the General Plan Amendment will be consistent with Policy LU-6.7, and provide development of a similar scale as under the existing General Plan land use designation in the form of one and two story single family homes.

In conclusion, the implementation of the General Plan Amendment would not substantially impact public views or scenic vistas, would be subject to the same goals and policies identified in the GPU EIR, and would result in less than significant impacts to scenic vistas.

VENTANA Specific Plan

The Project proposes to develop 103 single-family homes, a dog park, internal pedestrian pathways/trails, and open space common areas and stormwater retention. The Specific Plan allows building height of 28 feet (including both one- and two-story homes) in Planning Area 1, and 24 feet in Planning Area 2. Planning Area 1 allows homes to be 2 stories, while Planning Area 2 limits homes to 1 story. The Design Review application materials are consistent with these requirements.

The Project site is currently separated from existing structures and developments by walls on the west and chain link fences with vegetation shields to the north and east, and Avenue 50 and chain link fences and landscaping on the south.

The scenic vistas in this area of the City are associated with the Santa Rosa mountains to the west and southwest. The San Bernardino mountains and Indio Hills to the north are too distant to provide significant scenic vistas from south Indio. To the east, the very distant slopes of the eastern end of the San Bernardino range are somewhat visible, but do not represent a scenic vista. Views to the include existing development on the south side of Avenue 50, and distant views of the south end of the Santa Rosa range, mostly to the southwest. Public views from Avenue 50 to the south and southwest will be unaffected by the proposed Project.

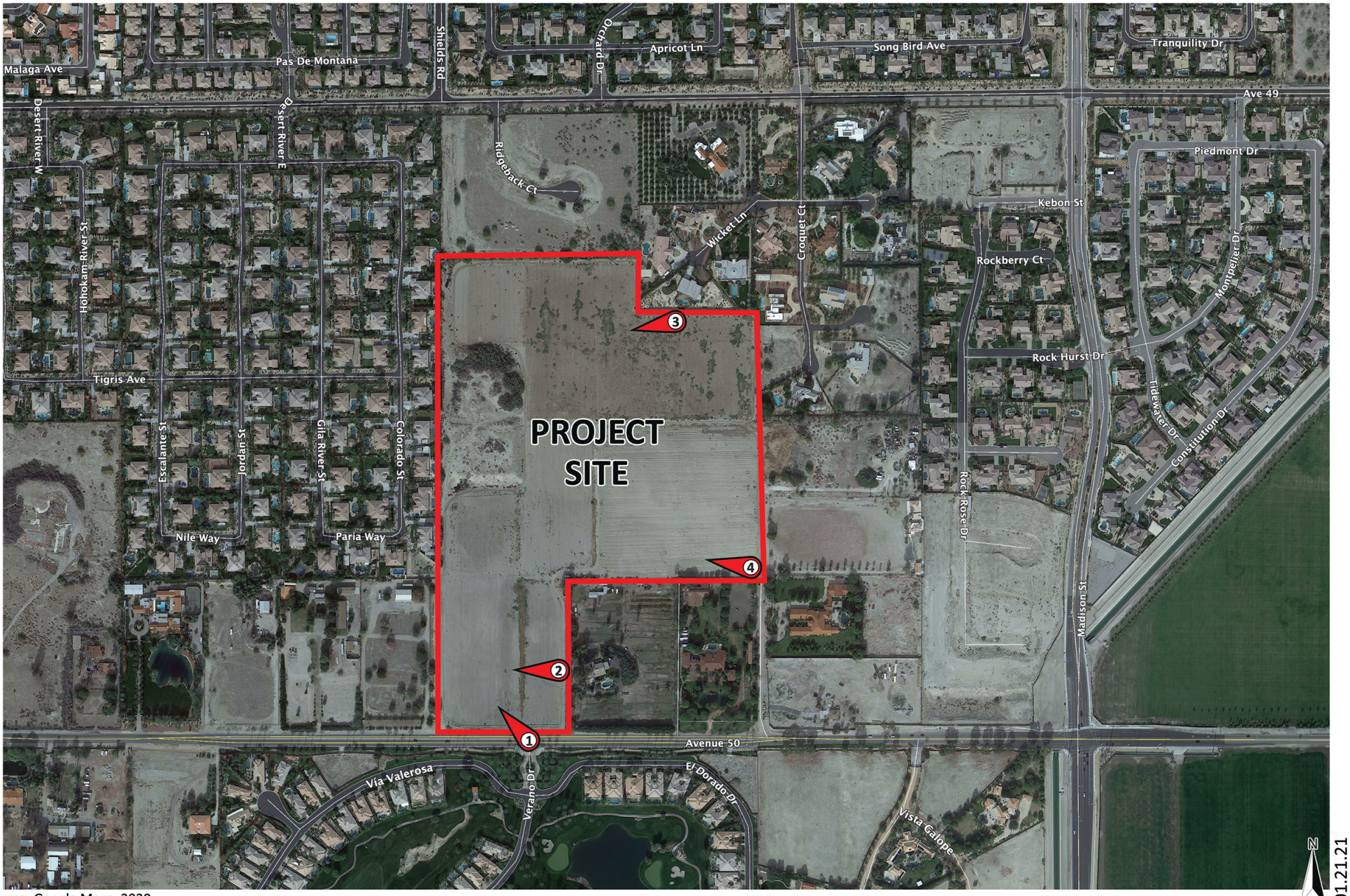
In order to determine impacts to scenic vistas, a series of visual simulations were prepared. Each of the 4 sites for the simulations is identified in Exhibit 2.3-5. These simulations characterize impacts to both public and private views from points surrounding the Project site. Although the analysis of private views is not a subject of review under CEQA, this analysis has been prepared to address concerns of private property owners raised during early consideration of the Project. Please note that in each of these simulations, the top view represents current conditions, and the bottom view is the built condition after completion of the Project.

View 1

View 1 represents the public view from Avenue 50 into the Project site (please see Exhibit 2.3-6). Under current conditions, views along Avenue 50 westbound are of the mid-range and peaks of the Santa Rosa mountains. Palm trees and parkway landscaping is visible on the south side of Avenue 50, and will remain as they currently occur. On the north side of Avenue 50, the vacant Project site is visible in the foreground, as are the perimeter wall of the residential subdivision immediately west of the Project site and the unimproved, dirt shoulder of Avenue 50. The foothills of the Santa Rosa range are blocked by existing landscaping within the adjacent lots and existing subdivision.

The visual simulation shows the view from the south side of Avenue 50, into and through the built project site. Under build out conditions, the obstruction of the foothills will remain, although blocked by Project single family homes in the foreground, rather than adjacent property landscaping. The views of the mid-range and peaks of the Santa Rosas will remain. The widened Avenue 50, including the parkway landscaping will provide an aesthetic consistent with existing development to the south, and other developments in the area. Scenic vistas of the Santa Rosa mountains will remain with implementation of the proposed Project, and will not be substantially affected by it. Views directly west on Avenue 50 will be unchanged from current conditions, as the Project will not affect views from traveling motorists down the street.

Impacts on scenic vistas from the public view from Avenue 50 will be similar to the current conditions, and will be less than significant.



Source: Google Maps, 2020

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VENTANA Specific Plan
Visual Simulations Key Map
Indio, California

Exhibit
2.3-5

EXISTING VIEW



PROPOSED VIEW



Source: KTGY Architecture, 2021

02.17.21

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VENTANA Specific Plan EIR
Visual Simulation - View 1
Indio, California

Exhibit
2.3-6

View 2

View 2 represents the views westerly from the side yard of the single family residence immediately east of the Project site. This is and will continue to be a private view. It is important to note that the single family home is elevated on a mound on the adjacent property that extends approximately 10 feet above current grade. The photograph was therefore taken from an elevated position, so as to mimic the location of the adjacent home. It is important to note that the view was taken from the eastern boundary of the Project site, not from the adjacent residence. Therefore, the existing landscaping, including a vegetated screen and a number of palm trees which occur along the neighboring property's western yard, are not shown under current conditions, but have been added to the simulation to convey the view from that property.

Under current conditions, views from the adjacent property of the foothills of the Santa Rosa mountains are blocked by landscaping on properties to the west of the Project site. The perimeter wall of the existing residential subdivision is also visible. Again, it is important to note that the existing landscaping on this property cannot be seen in this view, because access was not available to this private property. Foreground views consist of the vacant land of the Project site. The vacant site is not considered a scenic vista either in the General Plan or under CEQA.

Upon build out the Project, and with the addition of the landscaping that currently occurs on the adjacent property, foreground views will consist of the Project's perimeter wall, internal open space, and the entry drive, and background views of the mid-range and peaks of the Santa Rosa mountains. The scenic vistas provided by these mountain views will be unaffected by the Project. The landscaping which currently occurs to the west of the Project site will still be visible, and will continue to obstruct the views of the foothills of the mountains. At this location, although foreground views will be modified by the Project, the scenic vistas of the Santa Rosa mountains will be unaffected. No impact to scenic vistas from this view would occur.

View 3

View 3 represents the view from the single family homes located at the northeast corner of the Project site. This view was taken from approximately the western end of lot 87, as identified on Exhibit 1-4, looking west-southwest toward the Santa Rosa mountains. Under current conditions, foreground views consist of the vacant Project site, including the existing man-made mound at the west-central boundary of the site. Views of the Santa Rosa mountains can be clearly seen, and only the base of the mountains is obstructed by the man-made mound, existing development and landscaping in the distance.

Under build out conditions, foreground views will be of the proposed community park and retention basin, and adjacent single family homes on lots 72 and 73, as depicted on Exhibit 1-4. . Views of the base of the mountains will be more obstructed than under current conditions, but the mid-range and peaks of the Santa Rosa mountains would remain. At this location, although the breadth of the mountain views would be reduced, the scenic vistas will remain, and impacts will be less than significant.

EXISTING VIEW



PROPOSED VIEW



Source: KTGY Architecture, 2021

02.17.21

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VENTANA Specific Plan EIR
Visual Simulation - View 2
Indio, California

Exhibit
2.3-7

EXISTING VIEW



PROPOSED VIEW



Source: KTGY Architecture, 2021

02.17.21

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VENTANA Specific Plan EIR
Visual Simulation - View 3
Indio, California

Exhibit
2.3-8

EXISTING VIEW



PROPOSED VIEW



Source: KTGY Architecture, 2021

02.17.21

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VENTANA Specific Plan EIR
Visual Simulation - View 4
Indio, California

Exhibit
2.3-9

View 4

View 4 represents views from the southeast corner of the property, on the private roadway which occurs from Avenue 50 northerly along the Project's eastern boundary. The photo was taken from the approximate southeast corner of lot 76, as shown in Exhibit 1-4. This dirt roadway is bordered by a shallow berm, likely created by periodic scraping of the dirt road. The rail fence of the neighboring properties to the southwest can be seen in the foreground, as can the vacant Project site, including the man-made mound at the west-central boundary of the Project. The Santa Rosa mountains are entirely obstructed in the south half of the photo by existing landscaping on adjacent properties. Due west, the base of the mountains is obstructed by existing development and landscaping to the west of the Project site.

Under build out conditions, the foreground view will consist of the Project's perimeter wall, and the open space area beyond, as well as the home located on lots 76 and 30, as depicted on Exhibit 1-4. Views of the southern Santa Rosas will remain obstructed by vegetation on the existing single family homes to the southwest. The central view westerly through the site will preserve the views of the Santa Rosa range, and only marginally increase the obstruction of the base of the mountains from this site. As a result, views from this location will be substantially unaffected, and impacts to scenic vistas at this location will be less than significant.

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?

General Plan Amendment

The proposed General Plan Amendment will result in an additional 91 single family homes on the project site, when compared to the current density allowed in the Desert Estates Neighborhood designation. The scenic quality described in the General Plan and its EIR is associated not with density, but with the placement of buildings, parking and other aspects of development within the "placetypes" identified in the General Plan. The Desert Estates Neighborhood defines this placetype as including:

- Primary land uses are single family residential, agriculture and parks and recreation. Secondary land uses consist of hospitality and recreational uses.
- Streetscapes are to be informal, without curb and gutter, with informal street alignments and bordered by drainage swales.
- Block sizes are up to 2,000 feet in perimeter, and defined by trails or multi-use paths.
- Open space is provided through the integration of natural features into neighborhood design, and the provision of natural open space and greenways.

- Groupings of single family homes should be organized around natural areas. Homes should be significantly set back from the street to allow front yards with porches and patios. Buildings should be limited to 1 and 2 stories.

The proposed Transitional Neighborhood designation provides the following description of its placetype:

- Primary land uses consist of single family homes, parks and recreation.
- Streetscapes are simple, with rolled curbs and trails that encourage internal connectivity.
- Streets are internally oriented, with pedestrian-scaled blocks that include paths to connect residents to open space and community amenities.
- Open space is provided within the neighborhood, to avoid residents having to access major roadways, and consists of community-oriented areas for passive and active recreation.
- Lotting and layout of homes allows a range of single family lot sizes to promote diversity. Lots should be large enough to provide a functional back yard for each household.

The definitions of placetypes provided in the General Plan Amendment will not result in substantial differences in the visual character of projects designed under the Transitional Neighborhood designation. As identified in the GPU EIR, the visual character of the City will be altered by the implementation of the General Plan. The addition of a transition land use designation, which bridges the gap between the Desert Estates Neighborhood's 0-1 units per acre limit, and the Suburban Neighborhood's 0-8 units per acre limit is consistent with preserving the visual character of the Southern Neighborhoods' subarea, insofar as it provides a designation which limits the potential alterations to the visual character of the area which would result from a change to Suburban Neighborhood on the Project site or elsewhere in the City.

The General Plan Amendment will be required to comply with the same General Plan policies identified in the GPU EIR for visual character, including Policy LU-1.3, which requires that new development occur contiguous to existing development to provide a cohesive expansion of the City. The General Plan Amendment is also consistent with Policy LU-6.7, which requires that development of new neighborhoods be consistent and at a compatible scale to surrounding existing neighborhoods. In this case, the proposed General Plan Amendment will be consistent in scale to the single family homes occurring along its western boundary in terms of the intensity of the use of land, and will buffer less developed lands to the east from the Suburban Neighborhood lands designated to the west of the site. The General Plan Amendment will also be required to adhere to Policies LU-4.1, 4.2 and 4.3, which all govern the development of high quality, well designed projects that fit the City's natural and built environment. The General Plan Amendment is also consistent with Policy LU-8.3, which provides for connectivity for pedestrian access between placetypes on connecting streets. In this case, the build out of a project will extend sidewalk and bike lanes on Avenue 50, thereby facilitating non-vehicular access.

In summary, the implementation of the General Plan Amendment will not significantly impact community character, and will be consistent with the standards established in the General Plan's goals and policies for an expanded City whose character will change, but not substantially be altered by new development. Impacts associated with the General Plan Amendment are expected to be consistent with those identified in the GPU EIR, and remain less than significant.

VENTANA Specific Plan

The proposed Project site is currently vacant. The ultimate development of the site will result in the construction of 103 single-family detached homes, a dog park, internal pedestrian trails, and open space common areas. The proposed Project also includes landscaping and high-quality design features.

The Project site is visible from Avenue 50. The proposed Project includes a perimeter wall, entry and parkway landscaping consistent with that existing immediately south in the City of La Quinta. The improvement of Avenue 50 along the Project frontage will contribute to improving the visual character of the area by building out the Avenue 50 frontage to General Plan standards, and providing both pedestrian and bicycle access along this major roadway.

To preserve the aesthetic quality from Avenue 50, buildings proposed for the site will be designed and constructed in accordance with City standards. The site will be developed consistent with the proposed Specific Plan zoning standards, and will not conflict with these standards. Single family homes within the Project will be consistent in scale, mass and height to those already occurring in surrounding subdivisions. The Specific Plan does not propose building heights, setbacks or other standards which are substantially different from those currently occurring in the Zoning Ordinance for single family residential development. The proposed homes will be consistent in scale and mass to those already occurring to the west and north of the Project, and will not substantially change the visual character of the area. Therefore, impacts associated with visual character are expected to be less than significant.

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

General Plan Amendment

The GPU EIR found that the implementation of the General Plan would result in new sources of light and glare which could impact nighttime views. The GPU EIR further found that most of the City is currently developed, and already impacts night skies. A number of policies were identified which would reduce impacts associated with light and glare to less than significant levels. As would be the case with development under the Desert Estates designation, the implementation of the General Plan Amendment would also be subject to these policies. They include Policy CE-7.8, which requires that all lighting be shielded and directed away from open space areas; and Policy LU-11.2, which focuses on the provision of art, landscaping, signage and lighting that is reflective of the community's culture. In addition to these policies, the GPU EIR identified Municipal Code regulations regarding light and glare, which further reduce impacts.

The implementation of the General Plan Amendment would allow an additional 91 single family homes over the 45 currently permitted in the General Plan. These homes would require lighting, which would be shielded and directed away from open space, and limited to lighting on the property. With implementation of either the current or the proposed land use designation, lighting will occur at levels typical of residential development in the City. This level of lighting is not identified as being significant under the GPU EIR, and would not be significant with implementation of the General Plan Amendment, because the low levels of lighting generated by residential development, and the City's standards for shielding and limitations on spill-over lighting would apply. Although the implementation of the General Plan Amendment would increase lighting levels in the City, this increase is therefore not expected to be significant, and impacts would, as with the GPU EIR, be less than significant.

VENTANA Specific Plan

The proposed Project is located in an urban environment that includes existing sources of light and glare associated with nearby land uses. Nearby sources of light include exterior lighting on commercial and residential buildings, street lighting on the adjacent Avenue 50, passing vehicle headlights, and outdoor lighting on surface parking lots and buildings. Currently, there are no existing sources of light on the Project site.

Short-Term (Construction-Related) Impacts

During the construction phase, there would be no need to add security lighting for construction areas or construction staging areas, because nighttime construction is not anticipated. Therefore, impacts related to new sources of light and glare during construction would not occur.

Long-Term (Operations-Related) Impacts

At buildout, the site can be expected to generate increased levels of light and glare from interior and exterior building lighting, safety and security lighting, landscape lighting, and vehicles accessing the site during the day and nighttime. However, the Project would not require use of high intensity lighting. Lighting will consist of landscape lighting, and lights typical of single family residences, which are of low intensity. Some glare can also be expected from building windows during the day and nighttime. However, lighting and glare levels are not expected to exceed typical levels within the surrounding urban environment with little or no light escaping upward from the site. The proposed Project will be designed in accordance with the City's Public Works Engineering Standards (Indio-200, Street Light Residential Area)[1] and will properly shield light fixtures to minimize spillage onto adjacent properties. The Zoning Ordinance design standards will be incorporated as conditions of approval to assure that the proposed Project's light and glare impacts will be less than significant.

2.3.7 Mitigation Measures

Impacts associated with scenic vistas, visual character and light and glare would be less than significant. No mitigation measures are required.

[1] City Website - Public Works - Engineering Standards, https://www.indio.org/civicax/filebank/blobdload.aspx?blobid=28974, accessed February 2020.

2.3.8 Significance After Mitigation

Impacts to aesthetic resources would be less than significant without mitigation.

2.3.9 Cumulative Impacts

The GPU EIR identified the Coachella Valley, and more specifically the City of Indio and surrounding communities. The GPU EIR found that the implementation of General Plan policies, and the regulations contained in the Municipal Code would result in less than significant cumulative impacts on visual resources, visual character and light and glare. Under the GPA, development would be subject to the same policies and regulations, and would not significantly increase these impacts. The further urbanization of the City, along with the development of surrounding cities, would change the visual makeup of the Valley over time. However, this gradual change in the urban form of the City and region would have minimized impacts due to the policies and regulations of the City and surrounding jurisdictions, which hold similar standards regarding building height and mass, development on hillsides, overall development intensity, and lighting standards. The proposed Project would also be subject to these policies, standards and regulations. As a result, the General Plan Amendment's and the Project's contribution to cumulative aesthetic impacts are expected to be less than significant.

2.4 Agricultural and Forestry Resources

2.4.1 Introduction

This section addresses the potential environmental impacts of the proposed Project related to agriculture and forest resources. A background of agricultural and soils classification systems and programs is provided and any existing agriculture and forest resources in the Project area and surrounding area are characterized. The impact analysis focuses on potential direct and indirect conversion of agriculture and forest resources as well as potential conflicts with existing zoning for agricultural and forestry uses.

Information used in the preparation of this section was obtained primarily from the California Department of Conservation and the Indio General Plan Update (2040).

2.4.2 Thresholds of Significance

The Project would have a significant effect on agricultural and forestry resources if it would:

a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use.

b) Conflict with existing zoning for agricultural use, or a Williamson Act contract.

c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland production (as defined by Government Code section 51104(g)).

d) Result in the loss of forest land or conversion of forest land to non-forest use.

e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use.

The Initial Study determined that the Project would result in “No Impact” for threshold questions c) through e), above, because no lands designated for forestry occur in the City or Coachella Valley. Therefore, they are not analyzed further in this EIR.

2.4.3 Regulatory Framework

Federal

Farmland Protection Policy Act of 1981

The Natural Resources Conservation Service (NRCS), a federal agency within the U.S. Department of Agriculture (USDA), is the agency primarily responsible for implementation of the Farmland Protection Policy Act (FPPA). The FPPA requires federal agencies to coordinate with the USDA and NRCS if their activities may irreversibly convert farmland to nonagricultural use, either directly or indirectly. The purpose of the FPPA is to "minimize the extent to which federal programs contribute to the unnecessary conversion of farmland to nonagricultural uses." The FPPA requires federal agencies to examine potential direct and indirect effects to farmland of a proposed action and its alternatives before approving any activity that would convert farmland to nonagricultural use.

"Important Farmland" includes prime farmland, unique farmland, and farmland of statewide or local importance, as defined by Section 1540(c)(1) of the FPPA. Classification standards differ from state to state; each state may set its own criteria for classification in each category. Farmland subject to FPPA requirements can be forestland, pastureland, cropland, or other land, but not water or urban built-up land.

Farmland Protection Program

Established by the FPPA, the Farmland Protection Program is a voluntary program with the intended purpose of keeping productive farmland in agricultural uses. The NRCS administers the program and provides matching funds to state, local, and tribal governments, and nonprofit organizations with existing farmland protection programs to purchase conservation easements. Participating landowners agree not to convert the land to nonagricultural use and retain all rights to use the property for agriculture. A minimum of 30 years is required for conservation easements and priority is given to applications with perpetual easements.

U.S. Forest Service Management Plans

The National Forest Management Act (NFMA) requires the U.S. Forest Service (USFS) to develop land management plans to guide management of the national forests, grasslands, and prairie land that comprise the 193-million-acre National Forest System. The USFS Land and Resources Management Plans (Forest Plans) describe the management of national forests. These plans apply only to federal lands under the administration of the USFS; they are not applicable to privately owned land within the national forest boundaries or privately owned land adjacent to the national forest boundaries.

State

Farmland Mapping and Monitoring Program

The Department of Conservation, Division of Land Resource Protection, maps important farmlands throughout California using a system known as the Farmland Mapping and Monitoring Program (FMMP). Important farmlands are divided into the following five categories based on their suitability for agriculture:

- *Prime Farmland:* Land which has the best combination of physical and chemical characteristics for the production of crops. It has the soil quality, growing season, and moisture supply needed to produce sustained high yields of crops when treated and managed, including water management, according to current farming methods.
- *Farmland of Statewide Importance*: Land that is similar to Prime Farmland but with minor shortcomings, such as greater slopes or less ability to hold and store moisture.
- *Unique Farmland*: Does not meet the criteria for Prime Farmland or Farmland of Statewide Importance but has been used for the production of specific high-economic-value crops.
- *Farmland of Local Importance*: Land of importance to the local agricultural economy, as determined by each county's board of supervisors and local advisory committees.
- *Grazing Land*: Land on which the existing vegetation, whether grown naturally or through management, is suitable for grazing or browsing of livestock.

The FMMP focuses on agricultural land that has the special combination of soil quality, location, growing season, and moisture supply needed to produce sustained yields of crops. In order to be designated Prime Farmland, the soils must be classified as prime farmland and have been used for the production of irrigated crops at some time during the four years prior to 1998, the year that the farmland mapping was completed.

Williamson Act

The California Land Conservation Act of 1965, commonly known as the Williamson Act, provides a tax incentive for the voluntary enrollment of agricultural and open space lands in contracts between local government and landowners. The contract is for 10 years or longer and restricts the land to agricultural and open space uses and compatible uses defined in state law and local ordinances. Local government establishes an agricultural preserve defining the boundary within which a city or county will enter into contracts with landowners. Local governments calculate the property tax assessment based on the actual land use instead of the potential land value assuming full development. In the City of Indio, the last remaining agricultural preserves are found along the north and south boundaries of the City limits. According to the GPU EIR, there were approximately 30 acres of Williamson Act Contracts in the City limits and an additional 312 acres designated as agricultural preserves in 2015.

Right to Farm Act

The stated purpose of the Right to Farm Act is to "conserve, protect and encourage the development, improvement and continued viability of agricultural land and industries for the long-term production of food and other agricultural products, and for the economic well-being of the county's residents." It seeks to "balance the rights of farmers to produce food and other agricultural products with the rights of non-farmers who own, occupy or use land within or adjacent to agricultural areas." The Right to Farm Act has been enacted by Riverside County Ordinance 625.1; however, it is not specifically enabled by the City of Indio Municipal Code.

Local

Indio 2040 General Plan

The Indio 2040 General Plan serves as the overall guiding policy document for the City. The following General Plan goals and policies pertain either directly or indirectly to agricultural resources.

Parks, Recreation and Open Space Element

Policy PR-5.1: **Urban agriculture.** Support small-scale, urban agriculture and farming in residential areas, where possible, while ensuring such activities do not result in negative impacts on neighboring properties.

Health and Equity Element

Policy HE-3.3 **Construction Pollution**. Reduce particulate emissions from paved and unpaved roads, construction activities, and agricultural operations.

Policy HE-3.4 **Sensitive-Receptor Uses.** Discourage development of sensitive land uses – defined as schools, hospitals, residences, and elder and childcare facilities – near air pollution sources that pose health risks – including freeways and polluting industrial sites.

Policy HE-3.8 **Sensitive Receptors and Agricultural Operations**. When new sensitive receptors are proposed adjacent to existing active agricultural operations, ensure that an appropriate buffer is provided to minimize adverse impacts and that future residents will be provided with a notice specifying the potential nuisances, such as dirt, noise, odors, and slow-moving agricultural machinery that would be associated with the agricultural operations.

Policy HE-3.9 **Agricultural Outreach.** Work with the agricultural community to develop and distribute an informational brochure regarding best practices to reduce or eliminate surface and groundwater contamination, reduce particulate emissions from agricultural operations, minimize soil erosion, and prevent the buildup of salts in soils.

2.4.4 Environmental Setting

Agriculture was the first large scale land use to occur in the Coachella Valley. Access to high quality ground water, particularly in the eastern portions of the valley, allowed for extensive land conversion and crop production well before outside sources of water were imported via the All-American Canal. Access to these water sources allowed crops to flourish in an otherwise arid climate. Early crops favored by farmers included dates and citrus. Valley growers have since expanded to make the Coachella Valley a major producer of table grapes and truck crops. The City's agricultural industry today produces off-season and specialty crops, including grapes, citrus, dates, and other fruit and vegetable crops.

Another supporting factor to the Valley's agricultural success is the local soils. The City contains a wide variety of soils that vary in origin, degree of weathering, depth, and texture, many of which have the productive soil and other requisites to be well suited for agricultural uses. According to FMMP mapping, there are a total of 21,267 acres of Important Farmland within the City boundaries, of which 982 acres are Prime Farmland, 253 acres are Unique Farmland, and 2,092 acres are Farmland of Local Importance. Approximately 520 acres of these lands are in active use.

According to the 2040 General Plan, the City does not contain any land suitable for timber production and does not contain lands zoned for timberland production pursuant to the California Timberland Productivity Act of 1982.

2.4.5 Existing Conditions

Currently, the Project site is zoned for residential development and designated as "Desert Estates Neighborhood" on the General Plan land use map, which allows for agricultural and residential uses. The site is located in a developed area of the City surrounded by residential uses and major roadways. Historical aerial photographs suggest the Project site was in agricultural use from the early 1950's until around 2016 when agricultural operations were abandoned.[1]

The site is currently vacant and contains mixed debris and remnants of previous agricultural activities, including dripline irrigation systems, irrigation standpipes, and herbicide containers. The subject site is designated as Prime Farmland on the 2016 Riverside County Important Farmland map and Figure 4.2-1 of the General Plan Update EIR. When the GPU EIR was prepared, the Project site was designated as being in "active" agricultural production (GPU EIR Figure 4.2-2) and was considered Prime Farmland in that environmental analysis. However, the site is no longer in cultivation and the General Plan does not designate any lands for agricultural uses. The Project site does not contain any Williamson Act contracts.

[1] "Results of Phase I Environmental Site Assessment, Proposed Residential Development, Avenue 50 East of Jefferson Street, Indio, California," prepared by Sladden Engineering, October 2019.

A 7± acre property containing a single family home at the southeast corner of the Project site appears to include some land for agricultural activities. Neither the GPA nor the proposed Project would affect that property's ability to continue cultivation on the parcel, and no impact will occur.

2.4.6 Project Impacts

a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

b) Conflict with existing zoning for agricultural use, or a Williamson Act contract.

General Plan Amendment

According to the GPU EIR (page 4.2-9), implementation of the GPU would allow the development of urban land uses (commercial, residential, etc.) on parcels which are currently active or fallow agricultural lands. The GPU allows agricultural activities within the Desert Estates Neighborhood designation consistent with Policy PR-5.1, which supports agricultural activities, including small scale urban agriculture and farming in residential areas if they are well designed and compatible with existing or planned land uses. The Desert Estates designation also allows for non-agricultural uses (residential) and, therefore, it was determined that implementation of the General Plan could result in the direct conversion of agricultural land to non-agricultural uses. Specifically, the GPU could impact up to 520.7 acres of active farmland and 1,441.8 acres of fallow farmland, as these Important Farmlands have proposed land use types that allow non-agricultural uses. The City considered providing agricultural conservation easements through a conventional easement purchase mitigation program to compensate for lost farmland in the urban core, however it was determined that there are no policies or mitigation measures available to mitigate the irreplaceable loss of Prime, Unique, and Locally Important Farmland. Therefore, impacts regarding conversion of farmland to non-agricultural uses were considered significant and unavoidable.

The General Plan Amendment would change the land use designation on the Project site from Desert Estates Neighborhood (up to 1 du/ac) to Transitional Neighborhood (0-3 du/ac), thereby increasing the development potential on the subject property from a maximum buildout of 45 dwelling units to 136 dwelling units, an increase of 91 units, while also removing agriculture as an allowable use.

Implementation of the GPA will result in conversion of the vacant site to non-agricultural uses. The subject site is primarily surrounded by urban development, and with its limited size (45.17 acres) only accounts for approximately 0.2% of the total Important Farmland area (21,267 acres) in the City of Indio. Impacts resulting from the GPA are consistent with what was previously analyzed for the site in the GPU EIR, which assumed loss of all 1,962.5 acres of important farmland in the City, and the GPA will not increase the severity or introduce new

impacts to agricultural resources, nor will it result in changes to General Plan policies or conflict with existing agricultural production. In its approval of the General Plan, the City adopted a Statement of Overriding Considerations finding that significant adverse effects are acceptable because expected benefits outweigh unavoidable adverse environmental impacts. There are no Williamson Act contracts on the Project site, so no impact would occur. Therefore, the proposed GPA will have less than significant impacts on the conversion of farmland.

VENTANA Specific Plan

The VENTANA Specific Plan establishes development standards and design guidelines that would apply to the proposed Project on the subject property. Buildout of the Specific Plan would result in 103 single-family dwelling units on the Project site. As discussed above, development of the site with residential uses would convert 45.17 acres of Important Farmland, which accounts for approximately 0.2% of the total important farmland area (21,267 acres) in the City, to non-agricultural uses. Impacts resulting from the VENTANA Specific Plan are consistent with what was previously analyzed for the site in the GPU EIR, and the Specific Plan will not increase the severity of or introduce new impacts to agricultural resources. The City adopted a Statement of Overriding Considerations finding that significant adverse effects are acceptable because expected benefits of General Plan build out outweigh unavoidable adverse environmental impacts associated with the loss of agricultural lands in the City. Therefore, the VENTANA Specific Plan will have less than significant impacts on the conversion of farmland.

2.4.7 Mitigation Measures

The GPU EIR determined that that there are no policies or mitigation measures available to mitigate the loss of Prime, Unique, and Locally Important Farmland. Findings and a Statement of Overriding Considerations were adopted by the City stating that significant adverse effects are acceptable because expected benefits outweigh unavoidable adverse environmental impacts. No new mitigation measures are proposed.

2.4.8 Significance After Mitigation

Project impacts are considered less than significant and no new mitigation measures were proposed.

2.4.9 Cumulative Impacts

Using the summary of projections method to analyze cumulative impacts set forth in State CEQA Guidelines Section 15130 (b)(1)(B), impacts have been assessed on both a regional and local level. The study area for the GPU EIR (page 5-9) assessment of cumulative impacts to agricultural resources was the entire Coachella Valley. The EIR determined that future development facilitated by the GPU would have a significant impact to agricultural resources through the direct conversion of important farmland to non-agricultural uses. As development and population growth continue throughout the Coachella Valley, the conversion of agricultural

land in incorporated areas is also likely to continue. The conversion of agricultural land in the City of Indio, combined with the conversion of other agricultural lands, would represent a cumulative direct impact to agricultural resources, and the loss of important agricultural resources would be cumulatively considerable.

However, as described above, the Project would not increase the severity of or introduce new impacts to agricultural resources, nor would it result in changes to GPU policies or conflict with existing agricultural production. It was determined that the Project's impacts would be less than significant as impacts were previously considered in the GPU EIR and a Statement of Overriding Considerations was adopted by the City. Although Project development and agricultural conversion would not directly contribute to impacts in other areas, the GPU EIR determined that the loss of important agricultural resources would remain cumulatively considerable.

2.5 Air Quality

2.5.1 Introduction

The following section describes existing air quality in the Coachella Valley and analyzes the potential impacts associated with the General Plan Amendment and proposed Project. A variety of local and regional data and information, ranging from research and analysis conducted for the Project site to regional-scale planning and environmental documents, have been used in researching and analyzing the project and its potential effects on air quality.

2.5.2 Thresholds of Significance

The project would have a significant effect to air quality if the Proposed Project would:

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

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

c) Expose sensitive receptors to substantial pollutant concentrations?

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

The Initial Study determined that the Project would result in “No Impact’ for threshold question a) above. Therefore, it is not analyzed further in this EIR.

2.5.3 Regulatory Framework

Federal and State

Federal and state agencies have adopted air quality standards for a variety of pollutants. The Federal Clean Air Act (FCAA) requires the U.S. Environmental Protection Agency (U.S. EPA) to identify National Ambient Air Quality Standards (NAAQS), or “national standards” to protect public health and welfare. The California Clean Air Act (CCAA) became effective on January 1, 1989 and mandated health-based air quality standards at the state level. The California Air Resources Board (CARB) is responsible for enforcing state standards, which are generally more stringent than federal standards. One of the means standards are applied is through State Implementation Plans (SIP), which are prepared to assist regional air quality management districts in meeting the federal and state ambient air quality standards in accordance with the deadlines specified in the FCAA and emission reduction targets of the CCAA.

Criteria Pollutants

Federal and state air quality standards established for specific pollutants, which are called "criteria pollutants," are designed to protect the general population and especially that segment of the population that is most susceptible to respiratory distress or infection, including the elderly, children, asthmatics, or those weak from disease or illness. Criteria pollutants and their typical sources and health effects are as follows:

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

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

Nitrogen Oxide (NO_x) includes nitric oxide (NO), nitrogen dioxide (NO_2), and nitrous oxide (N_2O), which combined are known as nitrogen oxides. These oxides are produced at high temperatures during combustion as byproducts of motor vehicles, power plants, and off-road equipment. NO_x contributes to the formation of ozone serving as the primary receptor of ultraviolet light and initiating the photochemical reaction. Short-term exposure to nitrogen dioxide can result in airway constriction and diminished lung capacity and is highly toxic by inhalation. Populations living near roadways are more likely to experience effects of nitrogen oxides due to elevated exposure to motor vehicle exhaust. The SSAB is in attainment for NO_2, a criteria pollutant and the most abundant in the atmosphere among NO_x.

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

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

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

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

The air quality of a particular locale is considered to be in attainment if the measured ambient air pollutant levels for O_3, CO, SO_2 (1-hour and 24-hour), NO_2, and particulate matter (PM_{10}, $PM_{2.5}$, and visibility reducing particles are not exceeded and all other standards are not equaled or exceeded. Attainment also assumes the national standards (other than O_3, PM_{10}, and those based on annual averages or arithmetic mean) are not exceeded more than once per year. The O_3 standard is in attainment when the fourth highest eight-hour concentration in a year, averaged over three years, is equal to or less than the standard. For PM_{10}, the 24-hour standard is attained when the expected number of days per calendar year with a 24-hour average concentration above 150 $\mu g/m^3$ is equal to or less than one.

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

Table 2.5-1
State and National Ambient Air Quality Standards

Pollutant	State Standards		National Standards	
	Averaging Time	**Concentration**	**Averaging Time**	**Concentration**
Ozone (O_3)	1-hour 8-hour	0.09 ppm 0.07 ppm	1-hour 8-hour	None 0.070 ppm
Carbon Monoxide (CO)	1-hour 8-hour	20 ppm 9.0 ppm	1-hour 8-hour	35.0 ppm 9.0 ppm
Nitrogen Dioxide (NO_2)	1-hour AAM	0.18 ppm 0.030 ppm	1-hour AAM	0.10 ppm 0.053 ppm
Sulfur Dioxide (SO_2)	1-hour 24-hour	0.25 ppm 0.04 ppm	1-hour 3-hour	0.075 ppm 0.5 ppm
Particulate Matter (PM_{10})	24-hour AAM	50 mg/m^3 20 mg/m^3	24-hour AAM	150 mg/m^3 None
Particulate Matter ($PM_{2.5}$)	AAM 24-hour	12 mg/m^3 None	AAM 24-hour	12 mg/m^3 35 mg/m^3
Lead	30 day Avg.	1.5 mg/m^3	3 month Avg.	0.15 mg/m^3
Visibility Reducing Particles	8-hour	10-mile visibility	None	None
Sulfates	24-hour	25 mg/m^3	None	None
Hydrogen Sulfide	1-hour	0.03 ppm	None	None
Vinyl Chloride	24-hour	0.01 ppm	None	None

Sources: California Air Resources Board
Notes: ppm = parts per million; ppb= parts per billion; mg/ m^3 = micrograms per cubic meter of air; AAM = Annual Arithmetic Mean.

California Air Toxics Program

In 1983 California Legislature enacted AB 1807, the Toxic Air Contaminant Identification and Control Act, which establishes a process for identifying and control toxic air contaminants (TACs). In addition to AB 1807, the Air Toxics "Hot Spots" Information Assessment Act (AB 2588) was adopted requiring a statewide air toxics inventory, notification of people exposed to a significant health risk, and facility plans to reduce these risks. The CARB works alongside the Office of Environmental Health Hazard Assessment (OEHHA) to identify TACs and adopt Air Toxic Control Measures (ATCMs) to reduce the identified TACs. Where there are federal standards, CARB must, at minimum, adopt the standards established by the US EPA.

Regional and Local

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

Regional Pollutants of Concern

Local air quality conditions are determined by climate, geography, and regional activities, including grading, construction and vehicular traffic, as well as heating, cooling, and ventilation equipment. The criteria pollutants of concern in the Project area and the Coachella Valley are ozone (O_3) and particulate matter (PM_{10}). These are further described below:

Ozone Emissions

Under the Federal Clean Air Act, the Coachella Valley portion of the SSAB is classified as a "severe-15" O_3 non-attainment area for the 8-hour state standard, which means that the region must come into compliance with Federal ozone standards by December 31, 2027. With future emission controls, the Coachella Valley will achieve the 2008 8-hour federal O_3 standard by 2024.

SCAQMD studies indicate that most O_3 is transported to the Salton Sea Air Basin from the upwind South Coast Air Basin (SCAB). It is difficult to quantify the amount of ozone contributed from SCAB; however, reduced O_3 concentration in the SSAB depends, in part, upon reduced ozone emissions in the South Coast Air Basin.

PM_{10} Emissions

Historically, PM_{10} levels in the Coachella Valley are elevated due to fugitive dust emissions from grading and construction activities, agricultural practices, and strong wind. The finer materials, including sand and silt, can be picked up and transported by the wind and are referred to as "blowsand". PM_{10} particles associated with blowsand are of two types: (1) natural PM_{10} produced by direct particle erosion and fragmentation, and (2) secondary PM_{10} whereby sand deposited on roadways is further pulverized by motor vehicles and then re-suspended in the air by those vehicles. The project is located in a PM_{10} non-attainment area for the state and federal PM_{10} standard.

Air Quality Monitoring

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

According to the monitoring data,[1] the Palm Springs monitoring station exceeds the 8-hour federal and state ozone standards more frequently than the Indio site. This exceedance is attributable to the Palm Springs station's location closer to the San Gorgonio Pass where ozone is imported into the SSAB from air basins to the west. The annual average for PM_{10} was higher at the Indio and Mecca stations between 2015 and 2019. Limited 24-hour state data has been provided from all three stations the past several years, however it is assumed that PM_{10} levels continue to exceed state and federal standards until otherwise reported.

[1] ARB Annual Air Quality Data Tables. http://www.arb.ca.gov/adam/ Accessed January 2021.

Air Quality Management Plans

SCAQMD has adopted a series of Air Quality Management Plans (AQMPs) to meet the state and federal ambient air quality standards. In March 2017, the SCAQMD approved the 2016 AQMP. The 2016 AQMP continues to evaluate current integrated strategies and control measures to meet the NAAQS and explore new and innovative methods to reach its goals. Similar to the 2012 AQMP, the 2016 AQMP incorporates scientific and technological information and planning assumptions, including the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (2016-2040 RTP/SCS), a planning document that supports the integration of land use and transportation to help the region meet the federal CCAA requirements.

In September 2020, SCAG adopted the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy, which supersedes the 2016-2040 RTP/SCS. The SCAQMD is currently in the process of updating the next iteration of the AQMP (2022). The 2022 AQMP is being developed to address the requirements for meeting 2015 Ozone NAAQS, for which the South Coast Air Basin is classified as an "extreme" non-attainment area and the Coachella Valley is classified as a "severe-15" non-attainment area. The 2016 AQMP remains the ruling management plan until the 2022 AQMP is finalized and adopted by SCAQMD.

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

The 2016 AQMP does not include new modeling efforts for PM_{10}. Chapter 7 in the 2016 AQMP constitute the ozone SIP for the 2008 8-hour ozone NAAQS, which addresses the current status of ozone air quality and provides the strategy toward future attainment of the federal 8-hour ozone standards in the Coachella Valley.

The Riverside County portion of the SSAB, including the Coachella Valley, is subject to the provisions of the SCAQMD Rule Book,[3] which sets forth policies and other measures designed to meet federal and state ambient air quality standards. These rules, along with the 2016 AQMP are intended to satisfy the planning requirements of both the federal and state Clean Air Acts. The SCAQMD also monitors daily pollutant levels and meteorological conditions throughout the District.

The SCAQMD has established thresholds for certain criteria pollutants. Based on the District's emission thresholds for criteria pollutants, any project would be considered to have significant impacts to air quality if the daily emissions exceed the values shown in the table below during construction or operation:

[2] 2003 Coachella Valley PM_{10} State Implementation Plan, August 1, 2003.

[3] South Coast Air Quality Management District Rules and Regulations adopted February 4, 1977 and last updated February 7, 2020.

Table 2.5-2
Emissions Thresholds for SCAQMD

Criteria Pollutant	Daily Threshold (pounds)
Carbon Monoxide (CO)	550
Oxides of Nitrogen (NO_x)	100
Volatile Organic Compounds (VOC)	75
Oxides of Sulfur (SO_x)	150
Particulate Matter (PM_{10})	150
Particulate Matter ($PM_{2.5}$)	55

Source: SCAQMD daily thresholds for construction and operation within the Coachella Valley, April 2019.

Indio General Plan

Chapter 3 (Land Use and Urban Design) and Chapter 6 (Health and Equity) of the Palm Desert General Plan includes the following polices and implementation actions that pertain either directly or indirectly to air quality:

Goal LU-10 **Workplace and Employment Districts**. Employment-oriented districts provide space for industrial, manufacturing, office, and research and development in order to increase access to jobs and enhance the fiscal stability of the City.

Policy LU-10.4 **Non-polluting industries**. Promote development of non-polluting industries that are not major sources of air and water pollution or other negative externalities.

Policy LU-10.5 **Industrial Compatibility.** Where industrial uses are near existing and planned residential development, require that industrial projects be designed to limit the impact of truck traffic, air and noise pollution on sensitive receptors.

Goal HE-3 **Environmental Quality**. A City designed to improve the quality of the built and natural environments to reduce disparate health and environmental impacts.

Policy HE-3.1 **Regional air quality planning efforts.** Participate in air quality planning efforts with local, regional, and State agencies that improve local air quality to protect human health and minimize the disproportionate impacts on sensitive population groups.

Policy HE-3.4 **Sensitive-Receptor Uses**. Discourage development of sensitive land uses – defined as schools, hospitals, residences, and elder and childcare facilities – near air pollution sources that pose health risks – including freeways and polluting industrial sites.

Policy HE-3.5 **Truck Routes.** Designate truck routes to avoid sensitive land uses, where feasible.

Policy HE-3.6 **Smoke-Free.** Encourage smoke-free and Vape-free workplaces, multi -family housing, parks, and other outdoor gathering places to reduce exposure to second-hand smoke.

Policy HE-3.7 **Public Education.** Provide educational information about air quality issues and their health effects, including best practices for reducing and/or eliminating sources of indoor air pollution.

Policy HE-3.8 **Sensitive Receptors and Agricultural Operations.** When new sensitive receptors are proposed adjacent to existing active agricultural operations, ensure that an appropriate buffer is provided to minimize adverse impacts and that future residents will be provided with a notice specifying the potential nuisances, such as dirt, noise, odors, and slow moving agricultural machinery that would be associated with the agricultural operations.

Policy HE-3.10 **Lower Emission Fuel Technologies.** Support collaboration between State, regional, and local agencies to continue transitioning goods movement and transit vehicles to lower-emission fuel technologies in order to reduce vehicle air pollution.

Implementation Action HE-8: Zoning Code Updates. Amend City codes and ordinances for their impact on health. Topics that should be addressed include:

- Location of fast-food restaurants and liquor stores.
- Standards for improved indoor air quality resulting from pollution such as toxics, VOCs, mold, paint, asbestos, smoking, and other chemicals.
- Encouragement for HVAC systems that achieve high levels of indoor air quality.
- Reduction of dust and other emissions from construction sites and unpaved industrial areas of the City.
- Standards for multi-family buildings that locate along freeways or truck routes or near hazardous materials.

Implementation Action HE-9: Development Checklist. Coordinate with the Riverside County Public Health Department to implement a land development review checklist to ensure that projects enhance public health outcomes. The checklist should address topics such:

- Pedestrian environment
- Building siting
- Access to transit

- Access to parks
- Proximity to healthy food sources
- Proximity to existing or potential sources of pollution (such as freeways and land uses that use hazardous materials)
- Shade and tree canopy

Implementation Action HE-11: Regional Coordination. Cooperate with local, regional, and state agencies that work to improve air quality and mitigate negative health impacts.

Indio Dust Control Ordinance

The Indio Dust Control Ordinance[4] was enacted to comply with SCAQMD requirements. It requires a fugitive dust control plan for all projects that require earth moving activities such as excavation or grading, and any construction activity that disturbs topsoil. Each plan must describe dust control actions to be implemented onsite during various project phases, as well as mapping, signage, and recordkeeping requirements.

2.5.4 Environmental Setting

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

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

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

[4] Ordinance 904, Title XV Lan Usage, Chapter 152: Dust Control, Indio Municipal Code.

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

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

2.5.5 Existing Conditions

The Project area and the City of Indio are located within the Salton Sea Air Basin (SSAB) and under the jurisdiction of the South Coast Air Quality Management District (SCAQMD). In the project area, air quality is regulated by the SCAQMD, as well as federal and State policy. Air quality in the Salton Sea Air Basin has been impacted by emissions associated with increased development, population growth, and vehicle emissions. Although air pollution is emitted locally from various sources, some of the degradation of air quality within the Salton Sea Air Basin can be attributed to sources tributary to, but located outside of the basin.

Criteria Air Pollutants

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

Table 2.5-3
Salton Sea Air Basin Designation Status

Criteria Pollutants	Designation
1997 Ozone – 8-hour standard (0.080)	Nonattainment (Extreme)
2008 Ozone – 8-hour standard (0.075)	Nonattainment (Severe-15)
2015 Ozone – 8-hour standard (0.070)	Nonattainment (Severe-15)
Carbon Monoxide	Attainment
Nitrogen Dioxide	Attainment
Sulfur Dioxide	Attainment
PM_{10}	Nonattainment
$PM_{2.5}$	Attainment

Source: U.S. EPA Green Book last updated December 2020.

Wind Hazards and PM_{10}

The proposed Project area lies on the valley floor of the central Coachella Valley where wind erosion can be severe, particularly along Interstate-10 (I-10). The City measures wind erodibility from 1 to 8, 8 being the most severe. The Project site is located approximately 3 miles south/southwest of I-10 in an area with a level 2-3 Wind Erodibility Rating.[5] As discussed in Sections 2.5.3 and 2.5.4, strong winds lift and transport large quantities of sand and dust and contribute to regional exceedances of PM_{10} and $PM_{2.5}$ thresholds. Most native soils in the vicinity have been replaced with buildings, paved surfaces, and urban landscaping, and wind erosion hazards have been greatly reduced.

The Project site is currently vacant, sparsely vegetated, and characterized by fine sandy soils. Lands in the immediate vicinity of the Project site are primarily developed with single-family residential. There are several parcels of undeveloped land in the Project vicinity that are susceptible to wind erosion due to sparse vegetation and alluvial and aeolian soils and sands that are easily transported by strong winds.

2.5.6 Project Impacts

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?

General Plan Amendment

The General Plan Update (GPU) EIR assessed potential air quality impacts from criteria pollutant emissions resulting from buildout of the General Plan. The SCAQMD has established criteria pollutant thresholds for project-level analysis, however there are no thresholds or methodologies for program-level analysis, such as the GPU EIR. The EIR determined that due to the scale and size of the planning area, construction-related and operational air emissions for all criteria pollutants would exceed SCAQMD project-level significance thresholds, thus resulting in cumulatively considerably impacts. However, adverse effects would be reduced through implementation of federal, state, and regional regulations, compliance with SCAQMD and General Plan policies, and project-level CEQA review by the City and other relevant agencies (GPU EIR MM-AQ-1). Project-level CEQA review demonstrates that an individual project does not exceed SCAQMD significance thresholds or is mitigated to a less than significant level.

The proposed GPA will increase the 45-acre site's residential density from 1 DU/AC (Desert Estates) to 0-3 DU/AC (Transitional Neighborhood), which increases the site's maximum buildout potential by 91 single-family residential units for a total of 136 units. The California

[5] Figure 4.6-5, Indio General Plan.

Emissions Estimator Model (CalEEMod), version 2016.3.2 was used to estimate and compare worst-case scenario project-level emissions associated with buildout of the site under the existing land use designation and proposed GPA. Criteria pollutant emissions were calculated in CalEEMod using the following assumptions:

Existing LU Assumptions

- 45.17 acres site
- Max 45 single family residential units (Desert Estates 1 DU/AC)
- 1.5-year construction schedule starting mid-2021
- Preliminary grading plans estimate a net material export of 74,383 CY
- Assumed same daily trip rate for single-family residential land uses cited in the Project-specific Traffic Report (Kunzman Associates 2021)
- Applicant approved default construction equipment list (CalEEMod) for site preparation, grading, building construction, paving, and architectural coating.

Proposed GPA Assumptions

- 45.17 acres site
- Max 136 single-family residential units
- 2.5-year construction schedule (due to increased site density) starting mid-2021
- Preliminary grading plans estimate a net material export of 74,383 CY
- Assumes 1,284 daily trips per the Project-specific Traffic Report (Kunzman Associates 2021
- Applicant approved default construction equipment list (CalEEMod) for site preparation, grading, building construction, paving, and architectural coating.

The following tables describe construction-related and operational pollutant emissions for buildout of the site under the existing and proposed land use designations.

Table 2.5-4
Construction Criteria Pollutant Emissions GPA Comparison
(lbs./day)

	CO	NO_x	ROG	SO_x	PM_{10}	$PM_{2.5}$
Existing Conditions						
Max. Daily Emissions	36.5	73.0	8.0	0.2	9.5	6.0
SCAQMD Threshold	550.00	100.00	75.00	150.00	150.00	55.00
Exceeds Threshold	**No**	**No**	**No**	**No**	**No**	**No**
General Plan Amendment						
Max. Daily Emissions	38.5	73.5	10.0	0.2	9.5	6.0
SCAQMD Threshold	550.00	100.00	75.00	150.00	150.00	55.00
Exceeds Threshold	**No**	**No**	**No**	**No**	**No**	**No**

Source: CalEEMod Version 2016.3.2. See Appendix B for detailed tables. Value shown represents the average emissions of summer and winter outputs. Emissions rounded up to the nearest half number.
Note: PM_{10} and $PM_{2.5}$ emissions are shown as "mitigated" in the CalEEMod output tables; however, the mitigation used is standard dust control requirements imposed by the City.

Table 2.5-5
Operational Criteria Pollutant Emissions GPA Comparison
(lbs./day)

	CO	NO_x	ROG	SO_x	PM_{10}	$PM_{2.5}$
Existing Conditions						
Max. Daily Emissions	13.0	7.0	3.5	0.1	2.0	1.0
SCAQMD Threshold	550.00	100.00	75.00	150.00	150.00	55.00
Exceeds Threshold	**No**	**No**	**No**	**No**	**No**	**No**
General Plan Amendment						
Max. Daily Emissions	37.0	20.5	9.5	0.1	6.5	2.0
SCAQMD Threshold	550.00	100.00	75.00	150.00	150.00	55.00
Exceeds Threshold	**No**	**No**	**No**	**No**	**No**	**No**

Source: CalEEMod Version 2016.3.2. See Appendix B for detailed tables. Value shown represents the average emissions of summer and winter outputs. Emissions rounded up to the nearest half number.

As shown in the tables above, project-level construction and operation daily SCAQMD thresholds for CO, NO_x, ROG, SOx, PM_{10} and $PM_{2.5}$ will not be exceeded under either scenario. Buildout of the site under the proposed GPA would marginally increase emissions; however, the increase is negligible, and project-level impacts would remain less than significant.

The EIR determined that future development facilitated by the GPU would result in a considerable net increase in ozone, CO, PM10 and PM2.5, resulting in a significant impact to regional attainment of the NAAQS and CAAQS for the Coachella Valley. Compared to the GPU, the maximum buildout of the proposed GPA would result in marginally increased levels of criteria pollutants and would therefore contribute to the GPU's cumulatively considerable impacts. However, adverse effects would be reduced through adherence to federal, state, and regional regulations, compliance with SCAQMD thresholds and GPU policies, and project-level CEQA review by the City and other relevant agencies. Therefore, the GPA would result in only a marginal increase in criteria pollutants but would not contribute considerably to cumulative impacts on air quality in the Salton Sea Air Basin or Coachella Valley.

The City determined that the social and economic benefits of developing the planning area outweighed the severity of these impacts, and a Statement of Overriding Considerations was adopted. Implementation of the GPA would not result in any new adverse impacts or significantly increase the severity of previously identified significant impacts in the Certified EIR. Therefore, impacts are considered less than significant.

VENTANA Specific Plan

Buildout of the VENTANA Specific Plan will result in the direct and indirect generation and emission of air pollutants during construction and operation. The Project proposes to increase the site's density from a maximum potential of 45 dwelling units to 103 dwelling units and will

therefore increase criteria pollutant emissions previously assumed in the GPU EIR. Two buildout scenarios were modeled to assess air quality impacts: buildout of the Specific Plan, and maximum buildout potential for the site under the existing land use designation. The California Emissions Estimator Model (CalEEMod), version 2016.3.2, was used to estimate potential air pollutant emissions associated with the proposed Project.

Project-Related Construction Emissions

Construction activities will result in short-term criteria pollutant emissions associated with operation of construction equipment, employee commute, material hauling, and other ground disturbing activities. Criteria pollutant emissions were calculated in CalEEMod using the following assumptions:

Existing LU Assumptions

- 45.17 acres site
- Max 45 single family residential units (Desert Estates 1 DU/AC)
- 1.5-year construction schedule starting mid-2021
- Preliminary grading plans estimate a net material export of 74,383 CY
- Assumed same daily trip rate for single-family residential land uses cited in the Project-specific Traffic Report (Kunzman Associates 2021)
- Applicant approved default construction equipment list (CalEEMod) for site preparation, grading, building construction, paving, and architectural coating.

VENTANA Specific Plan Assumptions

- 45.17 acres site
- 103 single-family residential units (Transitional Neighborhood 0-3 DU/AC)
- 2-year construction schedule starting mid-2021
- Preliminary grading plans estimate a net material export of 74,383 CY
- Assumes 972 daily trips per the Project-specific Traffic Report (Kunzman Associates 2021
- Applicant approved default construction equipment list (CalEEMod) for site preparation, grading, building construction, paving, and architectural coating.

The following table describes construction-related pollutant emissions for buildout of the site.

Table 2.5-6
Construction Criteria Pollutant Emissions VENTANA Comparison
(lbs./day)

Max. Daily Emissions	CO	NO_x	ROG	SO_x	PM_{10}	$PM_{2.5}$
Existing Conditions	36.5	73.0	8.0	0.2	9.5	6.0
SCAQMD Threshold	**550.00**	**100.00**	**75.00**	**150.00**	**150.00**	**55.00**
Exceeds Threshold	**No**	**No**	**No**	**No**	**No**	**No**
VENTANA Specific Plan	38.5	73.0	10.0	0.2	9.5	6.0
SCAQMD Threshold	**550.00**	**100.00**	**75.00**	**150.00**	**150.00**	**55.00**
Exceeds Threshold	**No**	**No**	**No**	**No**	**No**	**No**

Source: CalEEMod Version 2016.3.2. See Appendix B for detailed tables. Value shown represents the average unmitigated emissions of summer and winter outputs. Emissions rounded up to the nearest half number.

* Source: "SCAQMD Air Quality Significance Thresholds" prepared by SCAQMD.

Note: PM_{10} and $PM_{2.5}$ emissions are shown as "mitigated" in the CalEEMod output tables; however, the mitigation used is standard dust control requirements imposed by the City.

As shown in the table above, project-level SCAQMD daily thresholds for CO, NO_x, ROG, SOx, PM_{10} and $PM_{2.5}$ will not be exceeded under either scenario. Buildout of the Specific Plan would marginally increase construction-related emissions; however, the increase is negligible, and impacts would remain less than significant.

Operation

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

The following table identifies the unmitigated pollutant emissions during operation of the proposed Project. Data represent maximum daily emissions. Similar to construction emissions, separate emissions estimates are provided for buildout under existing conditions for comparison purposes.

Table 2.5-7
Operational Criteria Pollutant Emissions Comparison
(lbs./day)

	CO	NO_x	ROG	SO_x	PM_{10}	$PM_{2.5}$
Existing Conditions						
Max. Daily Emissions	13.0	7.0	3.5	0.1	2.0	1.0
SCAQMD Threshold	550.00	100.00	75.00	150.00	150.00	55.00
Exceeds Threshold	**No**	**No**	**No**	**No**	**No**	**No**
VENTANA Specific Plan						
Max. Daily Emissions	37.5	20.5	9.5	0.1	6.5	2.0
SCAQMD Threshold	550.00	100.00	75.00	150.00	150.00	55.00
Exceeds Threshold	**No**	**No**	**No**	**No**	**No**	**No**

Source: CalEEMod Version 2016.3.2. See Appendix B for detailed tables. Value shown represents the average emissions of summer and winter outputs. Emissions rounded up to the nearest half number.

As shown in the table above, project-level SCAQMD daily thresholds for CO, NO_x, ROG, SOx, PM_{10} and $PM_{2.5}$ will not be exceeded under either scenario. Buildout of the Specific Plan would marginally increase operational emissions; however, the increase is negligible, and impacts would remain less than significant.

Cumulative Contribution: Non-Attainment Criteria Pollutants

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

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

As shown in the tables above, Project-related PM_{10} and ozone precursors (NOx and ROG) emissions are projected to be well below established SCAQMD thresholds. Emissions will be further reduced through adherence to standard City and SCAQMD rules and regulations pertaining to PM_{10} reduction, including implementation of a Dust Control Plan in accordance with SCAQMD Rule 403.1. Therefore, the VENTANA Specific Plan will result in incremental, but not cumulatively considerable impact on regional PM_{10} or ozone levels.

c) Expose sensitive receptors to substantial pollutant concentrations?

General Plan Amendment

The GPU EIR assessed potential impacts to sensitive receptors resulting from buildout of the General Plan. The EIR identified mitigation measures for project-level analysis (AQ-2(a) through AQ-2(c)) that would reduce potential exposure of sensitive receptors to substantial pollutant concentrations, including potential impacts from stationary and mobile sources of toxic air contaminants (TACs) and stationary criteria pollutants. Mitigation measures include, but are not limited to, project-level CEQA analysis and adherence to SCAQMD health risk assessment requirements when necessary, on a case-by-case basis. However, the program EIR determined that the mitigation measures may not completely avoid all impacts, and cumulative impacts associated with buildout of the General Plan were considered significant and unavoidable.

The General Plan Amendment will increase the site's residential density from 1 DU/AC (Desert Estates) to 0-3 DU/AC (Transitional Neighborhood). Future development would consist of low-density single-family dwelling units consistent with the type of development currently allowed. The subject site is not located in proximity to a land use that is considered a source of stationary or mobile TACs or stationary criteria pollutants. The GPA would not change the residential nature of the site's land use and the increase in potential residential units (91 unit increase at maximum buildout) would not obstruct or conflict with General Plan policies and programs. Adverse effects would be reduced through adherence to federal, state, and regional regulations, compliance with SCAQMD guidelines and GPU policies, and project-level CEQA review by the City and other relevant agencies. The City determined that the social and economic benefits of developing the planning area outweighed the severity of these impacts, and a Statement of Overriding Considerations was adopted. Implementation of the GPA would not result in any new adverse impacts or significantly increase the severity of previously identified significant impacts in the Certified EIR. Therefore, impacts would be less than significant.

VENTANA Specific Plan

The nearest sensitive receptors are residents in the single-family homes immediately adjacent to the Project site on all sides. To determine if the proposed Project has the potential to generate significant adverse localized air quality impacts, the mass rate Localized Significance Threshold (LST) Look-Up Table was used. Analysis of LSTs by a local government is voluntary and is designed for projects that are less than or equal to five acres. The maximum area of

disturbance associated with buildout of the proposed Project is approximately 45.17 acres, and it is assumed that buildout would occur over the course of two years. Although the total project area is greater than five acres, the area of daily disturbance (for purposes of LST analysis only) is limited to five acres or less per day at any given location. As such, the five-acre look up table is appropriate under the SCAQMD's methodology to screen for potential localized air quality impacts. [6]

The Mass Rate Look-Up tables for LSTs were used to determine if the proposed Project would have the potential to generate significant adverse localized air quality impacts during construction and operation. The LST for Source Receptor Area (SRA) 30 (Coachella Valley) was used to determine LST emission thresholds. The distance from the emission source and the maximum daily site disturbance also determines emission thresholds. For analysis purposes, the worst-case scenario of a sensitive receptor being within 25 meters was used. **Table 2.5-8** shows on-site emission concentrations for Project construction and operation will not exceed LST thresholds. Overall, the impacts will be less than significant.

Table 2.5-8
Localized Significance Thresholds Emissions
(pounds per day)

	CO	**NOx**	**PM_{10}**	**$PM_{2.5}$**
Construction				
Maximum Emissions	37.5	20.5	9.5	6.0
LST Threshold	**2,292.00**	**304.00**	**14.00**	**8.00**
Exceed?	**No**	**No**	**No**	**No**
Operation[1]				
Area	11.0	1.0	0.11	0.11
SCAQMD Thresholds	**2,292.00**	**304.00**	**4.00**	**2.00**
Exceed?	**No**	**No**	**No**	**No**

Emission Source: CalEEMod model, version 2016.3.2.
LST Threshold Source: LST Mass Rate Look-up Table, SCAQMD.
1. Operational emissions that affect sensitive receptors are limited to on-site area emissions. Energy and mobile emissions occur off-site.

Health Impacts

As shown in Tables **Table 2.5-4** and **Table 2.5-5**, construction and operation of the VENTANA Specific Plan will result in criteria emissions that are below the SCAQMD significance thresholds, and neither would violate any air quality standard or contribute substantially to an existing or projected air quality violation.

[6] South Coast AQMD, "Fact Sheet for Applying CalEEMod to Localized Significance Thresholds."

It is not scientifically possible to calculate the degree to which exposure to various levels of criteria pollutant emissions will impact an individual's health. There are several factors that make predicting a Project-specific numerical impact difficult:

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

Due to these limitations, the extent to which the Project poses a health risk is uncertain but unavoidable. It is anticipated that the impacts associated with all criteria pollutants will be less than significant overall, and that health effects will also be less than significant.

CO Hot Spot

After construction, loose soils will be stabilized by buildings, paved surfaces, and landscaping. Long-term operation of the Project will generate pollutants from vehicles accessing the site. Traffic may have the potential to contribute to local area air quality impacts, most notably the creation of CO "hot spots" at heavily congested intersections. Because CO is produced in greatest quantities from vehicle combustion and does not readily disperse into the atmosphere, these hot spots have the potential to exceed the state 1-hour standard of 20 ppm and/or the 8-hour standard of 9 ppm.

SCAQMD recommends an evaluation of potential localized CO impacts when a project causes the level of service (LOS) at a study intersection to worsen from C to D, or if a project increases the traffic volume (or demand) to capacity (V/C) ratio at any intersection rated D or worse by 2 percent or more. As discussed in Section 2.18, Transportation, the Traffic Impact Analysis conducted for the Project studied 8 intersections in the Project area. All study intersections operate at LOS C or better under existing (2019-2020) conditions, existing plus project (E+P), and opening year (2022) traffic conditions. Based on these results, the Project would not cause the LOS to worsen from C to D at any intersection and would not increase the V/C ratio at any intersection rated D by 2 percent or more. As such, none of the studied intersections would meet these evaluation criteria, and therefore, the proposed Project would not result in the creation of a CO hotspot. Sensitive receptors would not be exposed to substantial pollutant concentrations as the result of Project traffic, and impacts would be less than significant.

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

General Plan Amendment

The General Plan Update (GPU) EIR assessed potential impacts to the population from odors and other emissions resulting from buildout of the General Plan. The EIR determined that

adherence to Policy LU-10.5: Industrial Compatibility, Policy HE -3.4: Sensitive-Receptor Uses, and Policy HE-3.8: Sensitive Receptors and Agricultural Operations, would ensure that new sensitive receptors are provided with an appropriate buffer to minimize adverse impacts and that all odor producing sources are minimized and impacts would be less than significant.

The General Plan Amendment will increase the site's residential density from 1 DU/AC (Desert Estates) to 0-3 DU/AC (Transitional Neighborhood). The GPA does not propose changes to General Plan policies and the increase in potential residential units (91 unit increase at maximum buildout) would not obstruct or conflict with General Plan policies and programs as they related to objectionable odors affecting existing and future sensitive receptors. All future development will be subject to these polices and regulations, and implementation of the GPA would not result in any new adverse impacts or increase the severity of previously identified significant impacts in the Certified EIR. Therefore, impacts are considered less than significant.

VENTANA Specific Plan
The occurrence and severity of odor impacts depend on numerous factors, including nature, frequency, and intensity of the source; wind speed and direction; and sensitivity of the receptors. SCAQMD identifies certain land uses as sources of odors. These land uses include agriculture (farming and livestock), wastewater treatment plants, food processing plants, chemical plants, composting facilities, refineries, landfills, transfer stations, and fiberglass molding.

The Specific Plan will be developed with residential uses and has the potential to result in short-term odors associated with operation of heavy equipment during grading, excavation, and other construction activities. Odors from paints, coatings, and asphalts also will be emitted during construction. However, construction-related odors will be temporary and quickly dispersed below detectable levels as distance from the construction area increases. Existing GPU policies regulations such as SCAQMD Rule 403.1 and Rule 481 would continue to minimize odor impacts. At buildout, residential units will generate typical odors from cooking and other household activities but will not generate objectionable odors. Therefore, impacts from objectionable odors are expected to be less than significant.

2.5.7 Mitigation Measures

Implementation of the proposed Project will result in less than significant air quality impacts. The GPU EIR adopted a Statement of Overriding Considerations for cumulative air quality impacts associated with buildout of the General Plan. The analysis and mitigation measures identified to reduce air quality impacts in the GPU EIR would apply to the proposed Project and as demonstrated in this section, new mitigations measures are not required.

2.5.8 Significance After Mitigation

Additional mitigation measures are not required, therefore impacts remain less than significant.

2.5.9 Cumulative Impacts

Using the summary of projections method to analyze cumulative impacts set forth in State CEQA Guidelines Section 15130 (b)(1)(B), impacts have been assessed on both a regional and local level. The study area for the GPU EIR (page 5-10) assessment of cumulative impacts to air quality was the Salton Sea Air Basin and greater Coachella Valley region. The primary document used to determine cumulative impacts was the SCAQMD 2016 AQMP, in addition to state and federal regulations for reducing and limiting criteria pollutant emissions.

As discussed in Section 2.5.6.b, above, a significant impact could occur if the project would make a considerable cumulative contribution to federal or State non-attainment pollutants. The Coachella Valley portion of the SSAB is classified as a "non-attainment" area for PM_{10} and ozone. SCAQMD recommends that an individual project's potential contribution to cumulative impacts should be assessed utilizing the same significance criteria as those for project-specific impacts. Furthermore, SCAQMD states that if an individual development project generates less than significant construction or operational emissions, then the development project would not generate a cumulatively considerable increase in emissions for those pollutants for which the Basin is in nonattainment.

The GPU EIR determined that future development facilitated by the General Plan would result in a considerable net increase in ozone, CO, PM10 and PM2.5, resulting in a significant impact to regional attainment of the NAAQS and CAAQS for the Coachella Valley. Compared to the General Plan, both the maximum buildout of the proposed GPA and VENTANA Specific Plan would result in increased levels of criteria pollutants, albeit marginal, and would therefore contribute to the cumulatively considerable impacts. Adverse effects would be reduced through adherence to federal, state, and regional regulations, compliance with SCAQMD thresholds and GPU policies, and project-level CEQA review by the City and other relevant agencies. The City determined that the social and economic benefits of developing the planning area outweighed the severity of these impacts, and a Statement of Overriding Considerations was adopted. Implementation of the GPA would not result in any new adverse impacts or significantly increase the severity of previously identified significant impacts in the Certified EIR. Therefore, cumulative impacts from the proposed GPA are considered less than significant.

Project-level PM_{10} and ozone precursors (NOx and ROG) emissions for both the VENTANA Specific Plan and maximum buildout of the proposed GPA are projected to be well below established SCAQMD thresholds. Therefore, project-level impacts would result in only a marginal increase in criteria pollutants but would not contribute considerably to cumulative impacts on air quality in the Salton Sea Air Basin or Coachella Valley.

2.6 Biological Resources

2.6.1 Introduction

The follow provides an overview of the existing biological resource conditions within the Project area and surrounding region and an analysis of potential biological resource impacts that would result from implementation of the proposed Project. This discussion is based on the Project-specific Biological Resources Assessment and Coachella Valley Multiple Specifics Habitat Conservation Plan Compliance Report prepared by Wood Environment & Infrastructure, Inc.[1] The report is appended to this EIR as Appendix C. The Project site was surveyed on foot on October 9, 2020; the findings of the survey are included in the report.

2.6.2 Thresholds of Significance

The following thresholds of significance or criteria are derived from Appendix G of CEQA, which is used to determine if and to what extent a project may have a potentially significant impact on biological resources. The proposed Project would have a significant effect on biological resources if it is determined that the Project will:

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

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

c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.

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

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

[1] "Biological Resources Assessment and Coachella Valley Multiple Species Habitat Conservation Plan Compliance Report, Ventana Project, City of Indio, Riverside County, California," Wood Environment & Infrastructure, Inc., October 13, 2020.

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

The Initial Study determined that the Project would result in "No Impact" for threshold questions b), c) and d), above. Therefore, they are not analyzed further in this EIR.

2.6.3 Regulatory Framework

Federal

Endangered Species Act (ESA)
The United States Fish and Wildlife Service (USFWS) and the National Marine Fisheries Service are the designated federal agencies accountable for administering the ESA. ESA defines species as "endangered" or "threatened" and provides regulatory protection at the federal level.

Section 9 of the ESA prohibits the "take" of listed (i.e. endangered or threatened) species. The ESA definition of take is "to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, collect, or attempt to engage in such conduct." Recognizing that take cannot always be avoided, Section 10(a) includes provisions for take that is incidental to, but not the purpose of, otherwise lawful activities. Specifically, Section 10(a)(1)(A) permits (authorized take permits) are issued for scientific purposes. Section 10(a)(1)(B) permits (incidental take permits) are issued for the incidental take of listed species that does not jeopardize the species. Section 10(a) of the ESA also establishes standards for the content of habitat conservation plans, such as the Coachella Valley Multiple Species Habitat Conservation Plan (CVMSHCP).

Section 7(a)(2) requires federal agencies to evaluate a proposed Project with respect to species currently listed or proposed to be listed, and their respective critical habitat (if applicable). Federal agencies must employ programs for the conservation of listed species and are prohibited from authorizing, funding, or carrying out any action that would jeopardize a listed species or destroy or modify its critical habitat. As defined by the ESA, "individuals, organizations, states, local governments, and other non-federal entities are affected by the designation of critical habitat only if their actions occur on federal lands, require a federal permit, license, or other authorization, or involve federal funding."

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

Section 404 of the Clean Water Act

This section of the Clean Water Act (CWA), administered by the US Army Corps of Engineers (USACE), regulates the discharge of dredged and fill material into "Waters of the United States" (WOTUS). The USACE has created a series of permits that authorize certain activities within waters of the U.S. The USACE delineates non-wetland waters in the Arid West Region by identifying the ordinary high-water mark (OHWM) in ephemeral and intermittent channels (USACE, 2008a). The OHWM is defined in 33 CFR 328.3(e). The subject Project site is not located within federal jurisdictional waters and, therefore, a CWA 404 permit is not required.

Wetlands and Other Special Aquatic Sites

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

State

California Endangered Species Act (CESA)

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

The Native Plant Protection Act (NPPA)

The NPPA includes measures to preserve, protect, and enhance rare and endangered native plant species. Definitions for "rare" and "endangered" are different from those contained in CESA. However, the list of species afforded protection in accordance with the NPPA includes those listed as rare and endangered under CESA. NPPA provides limitations on take as follows: "no person will import into this state, or take, possess, or sell within this state" any rare or endangered native plants, except in accordance with the provisions outlined in the act. If a landowner is notified by CDFW, pursuant to section 1903.5, that a rare or endangered plant is growing on their property, the landowner shall notify CDFW at least 10 days prior to the changing of land uses to allow CDFW to salvage the plants.

Natural Community Conservation Planning (NCCP) Program

California's NCCP program, which is managed by the CDFW, is intended to conserve multiple species and their associated habitats, while also providing for compatible use of private lands. Through local planning, the NCCP planning process is designed to provide protection for wildlife and natural habitats before the environment becomes so fragmented or degraded by development that species listing are required under CESA. Instead of conserving small, often isolated "islands" of habitat for just one listed species, agencies, local jurisdictions, and/or other interested parties have an opportunity through the NCCP to work cooperatively to develop plans that consider broad areas of land for conservation that would provide habitat for many species. Partners enroll in the programs and, by mutual consent, areas considered to have high conservation priorities or values are set aside and protected from development. Partners may also agree to study, monitor, and develop management plans for these high value "reserve" areas.

The NCCP provides an avenue for fostering economic growth by allowing approved development in areas with lower conservation value. The Project site is in a combined Habitat Conservation Plan (HCP)/NCCP (see Coachella Valley Multiple Species Habitat Conservation Plan/NCCP, below).

Sections 1600-1603 of the State Fish and Game Code

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

Section 2081 of the California Fish and Game Code

Under Section 2081 of the California Fish and Game Code, the CDFW authorizes individuals or public agencies to import, export, take, or possess state endangered, threatened, or candidate species in California through permits or memoranda of understanding. These acts, which are otherwise prohibited, may be authorized through permits or "memoranda of understanding" if (1) the take is incidental to otherwise lawful activities, (2) impacts of the take are minimized and fully mitigated, (3) the permit is consistent with regulations adopted in accordance with any recovery plan for the species in question, and (4) the applicant ensures suitable funding to implement the measures required by the CDFW. The CDFW shall make this determination based on the best scientific information reasonably available and shall include consideration of the species' capability to survive and reproduce.

Section 3505.5 of the State Fish and Game Code

Section 3505.5 makes it unlawful to take, possess, or destroy any birds in the order Falconiformes or Strigiformes (birds-of-prey, e.g.: owls, hawks, eagles, etc.) or to take, possess, or destroy the nest or eggs of any bird-of-prey.

Regional/Local

Coachella Valley Multiple Species Habitat Conservation Plan (CVMSHCP)/ NCCP

Subsequent to the establishment of the Fringe-toed Lizard HCP in the early 1980s, continued growth in the Coachella Valley impacted other species and their habitats. Several species that occur in the Coachella Valley have been listed as threatened or endangered, and several more have been proposed for listing or identified as candidates for listing. A scoping study was prepared for the Coachella Valley Association of Governments (CVAG) by the Coachella Valley Mountains Conservancy (Conservancy) in 1994. It was recommended that a Multiple Species Habitat Conservation Plan (MSHCP) be prepared for the entire Coachella Valley and surrounding mountains to address potential state and federal Endangered Species Act issues in the proposed MSHCP area. Subsequently, a Memorandum of Understanding (MOU) was developed to govern the preparation of the MSHCP. In late 1995 and early 1996, the cities of Cathedral City, Coachella, Desert Hot Springs, Indian Wells, Indio, La Quinta, Palm Desert, Palm Springs, and Rancho Mirage, Coachella Valley Water District, Riverside County Flood Control and Water Conservation District, Imperial Irrigation District, the County of Riverside, USFWS, CDFW, the Bureau of Land Management (BLM), the U. S. Forest Service (USFS), and the National Park Service (NPS) signed the MOU to initiate the planning effort.

In late 1996 and early 1997, the parties to the MOU approved an amendment stipulating that the MSHCP will meet the intent of the Natural Community Conservation Planning (NCCP) Act as well as the California Endangered Species Act (CESA) and the Federal Endangered Species Act (FESA), and, further, that the MOU constitutes an agreement to prepare a NCCP. Final state and federal resource agency approval and permitting for the CVMSHCP occurred in September and October 2008.

The CVMSHCP/NCCP encompasses approximately 1.1 million acres and conserves approximately 240,000 acres of open space. It addresses the conservation needs of a variety of plant and animal species and plant communities. It establishes a system of preserves outside of urbanized areas to protect lands with high conservation values and streamlines development permit processing by providing the Plan's Permittees with long-term (75-year) incidental take permits under state and federal endangered species acts. Indio is a Plan Permittee; as such, the City must comply with all applicable terms and conditions of the CVMSHCP/NCCP, including the collection of local developer mitigation fees.

Indio General Plan

Chapter 8 (Conservation Element) of the Indio General Plan includes the following goals and policies that pertain either directly or indirectly to biological resources:

Goal CE-7 Biological Resources. The protection and conservation of sensitive biological resources.

CE-7 Policies

CE-7.1 **CVMSHCP and other regulations**. Implement the CVMSPHCP. Ensure development is consistent with federal, State, and regional regulations for habitat and species protection.

CE-7.2 **Desert fan palm**. Work with Riverside County, public and private landowners to maintain and enhance the desert fan palm oases located in the southern slopes of the Indio Hills.

CE-7.3 **Riparian resources**. Preserve and enhance wetland functions and values to the extent feasible and maintain ecological integrity in order to support riparian resources.

CE-7.4 **Volunteerism**. Encourage community volunteerism and stewardship to help protect and rehabilitate natural resources.

CE-7.5 **Public and private partnerships**. Encourage public and private partnerships to acquire and protect habitat areas containing sensitive resources for preservation as permanent open space.

CE-7.6 **Native plants.** Incorporate native desert plant materials into new development projects to the extent possible and feasible.

CE-7.7 **Sensitive biological area development**. Apply appropriate land use and development regulations to limit development of sensitive biological areas, including wetlands, wildlife movement corridors, and sensitive habitats.

CE-7.8 **Preserve night sky**. Ensure that outdoor lighting is shielded and directed away from natural open space areas.

CE-7.9 **Hazards and open space**. Maintain open space areas that are designed to protect people and property from risks associated with hazards, such as fault lines, flood zones, high voltage power line areas, and electrical substations.

CE-7.10 **Agency coordination**. Communicate with neighboring jurisdictions (including the cities of La Quinta, Indian Wells, Palm Desert, Coachella, and the County of Riverside), regional agencies (including the Southern California Association of Governments (SCAG), Coachella Valley Association of Governments (CVAG), and the Local Agency Formation Commission (LAFCO), and Riverside County Transportation Commission (RCTC)), Caltrans, and the SunLine Transit Agency to seek opportunities to improve and expand upon the regional open space/biological preserve system.

CE-7.11 **Aquifer recharge areas**. Continue to identify and protect aquifer recharge areas and natural drainages throughout Indio.

Indio Heritage Tree Protection Ordinance

The City's Municipal Code, Chapter 98, provides for the protection of specified trees on City property or in City rights-of-way, including Heritage Trees. Heritage Trees are defined as those trees "which have been found to be of significance to the community or of notable historic interest" as determined by the Community Services Commission. Subsection 98.09 provides for the protection of City trees from damage, removal or other action without appropriate permits.

2.6.4 Environmental Setting

The City of Indio and the Coachella Valley are located at the western edge of the Colorado Desert subdivision of the Sonoran Desert. This region is characterized by an extremely hot and dry climate, with a low elevation valley floor bordered by rocky mountain slopes and ranges. The unique geomorphic and geographic terrain has created an environment that supports many diverse species that have adapted to the extreme climatic conditions.

A wide range of common plant species, such as mesquite, smoke tree, desert holly, creosote bush, and palo verde, are supported by the conditions present in the valley, as are a wide range of wildlife species. Bird species include golden eagle, western burrowing owl, and others. There are also a range of sensitive plant and animal species present in the Coachella Valley, some of which have been listed as threatened or endangered by federal and state agencies.

Within the Coachella Valley region, some plant species that are federally listed as endangered include the Coachella Valley milkvetch and triple-ribbed milkvetch. Threatened or endangered wildlife species include the Peninsular bighorn sheep, Casey's June beetle, Coachella Valley fringe-toed lizard, arroyo southwestern toad, and mountain yellow-legged frog. Sensitive bird species include the least Bell's vireo and southwestern flycatcher, both listed as endangered. In addition, there are several species of birds considered "sensitive" by state and federal wildlife resource agencies.

2.6.5 Existing Conditions

The Project site is currently vacant and contains sparse vegetation and miscellaneous piles of trash and debris. The proposed Project is within the boundaries of and subject to the provisions of the Coachella Valley Multiple Species Habitat Conservation Plan (CVMSHCP).[2] The CVMSHCP is a comprehensive regional plan that balances growth in the Coachella Valley with the requirements of federal and State endangered species laws. The Project site is not located within or adjacent to a CVMSHCP Conservation Area. The following discussion is based on the findings of the Project-specific Biological Resources Assessment (BRA) (Wood, 2020).

[2] Recirculated Final Coachella Valley Multiple Species Habitat Conservation Plan; Figure 8-3.

Soils and Topography

The Project site is relativity flat, with the exception of a small hill on the west central edge of the site. Elevations range from approximately 25 to 45 feet above mean sea level. According to the USDA Web Soil Survey, the Project site contains three distinct soil types:

- Myoma fine sand (MaB), 0-5% slopes: A nearly level soil that is found on alluvial fans, lacustrine basins, and flood plains of the Coachella Valley. This soil type is generally located on the northern, rear portion of Project site.
- Gilman fine sandy loam (GbA), 0-2% slopes: The Gilman series consists of very deep, well drained soils that formed in stratified stream alluvium. Gilman soils are on flood plains and alluvial fans and have slopes of 0 to 3 percent. This soil type is generally located on the southern, central portion of the site, with a small parcel located at the northeastern corner of the site.
- Indio fine sandy loam (Ip): The Indio series consists of very deep, well or moderately well drained soils formed in alluvium derived from mixed rock sources. Indio soils are on alluvial fans, lacustrine basins and flood plains and have slopes of 0 to 3 percent. This soil type is generally located on the southwestern edge of the Project site.

Hydrology/ Jurisdictional Waters

No hydrological features such as washes or basins occur on the site.

Special-Status Species (Wildlife and Vegetation)

The BRA identified 31 special-status elements (plants, animals, and vegetation communities) with the potential to occur in the Project vicinity during the literature review, 13 of which were determined to be absent during the site survey or due to a lack of suitable habitat or range onsite. Of the remaining 18 species which have some occurrence potential, four are fully covered and conserved through participation in the CVMSHCP: Mesquite Bosque (Mesquite Hummocks), Coachella giant sand treader cricket, western yellow bat, and Coachella Valley (Palm Springs) round-tailed ground squirrel. Since potential impacts to these four species will be mitigated through participation in the CVMSHCP, payment of the development fee required of the Project will mitigate impact to these species. The remaining 14 species are addressed below.

Plants and Vegetation Communities

The site was predominantly utilized for agriculture but is currently inactive, and all agricultural portions of the site are currently covered by dry remains of weedy annuals. Six (6) special-status plant species not covered by the CVMSHCP have a remote probability of occurrence onsite in the remnant disturbed natural habitat: gravel milk-vetch, glandular ditaxis, Abram's spurge, ribbed cryptantha, slender cottonheads, and narrow-leaf sandpaper plant. Given the extensive soil disturbances that occurred during agricultural use of the Project site, no significant population of these species was anticipated, and no further action was recommended in the BRA.

Mammals

In addition to the western yellow bat (CVMSHCP covered), one other bat species is likely to occur in the area. The pocketed free-tailed bat in particular may forage on site, but is not expected to roost; therefore, the Project is unlikely to have any significant impact on uncovered bat species. The BRA does not recommend any further action with regards to mammals.

Bird Species

Six (6) special-status bird species with the potential to nest and/or forage onsite include the Costa's hummingbird, loggerhead shrike, vermilion flycatcher, prairie falcon, burrowing owl, and black-tailed gnatcatcher. During the field survey, the biologist observed a seventh species, the double-crested cormorant (not covered by the CVMSHCP), passing overhead, but found no presence of nesting or foraging habitat. All of these species are protected from take by the MBTA and state code, and potential Project-related impacts will be reduced through nesting bird surveys.

CVMSHCP Consistency

The site is not within or adjacent to any CVMSHCP Conservation Area, so there will be no edge effects. The Project will not interfere with any conservation area objectives. No wildlife corridors or biological linkages are mapped, known, or expected onsite, so no impacts are expected.

2.6.6 Project Impacts

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

General Plan Amendment

The proposed Project site is located in a developed area of the City surrounded by residential uses and major roadways. The General Plan Amendment would change the land use designation on the Project site from Desert Estates Neighborhood (up to 1 du/ac) to Transitional Neighborhood (0-3 du/ac), thereby increasing the development potential on the subject property from a maximum buildout of 45 dwelling units to 136 dwelling units, an increase of 91 units. The implementation of the GPA would not significantly change impacts to biological resources, because the entire Project site (±45 acres) would be expected to be graded and fully disturbed under either the current or the proposed General Plan land use designation. Although the increased density would reduce the potential for greater areas of open space for common species to use as forage and nesting areas, implementation of either land use designation would result in similar impacts.

The General Plan Update (GPU) EIR determined that impacts to special status species associated with General Plan buildout would be reduced to less than significant levels through adherence to state, regional, and federal regulations, including the General Plan policies

described in Section 2.6.3 above. Particularly relevant to the protection of special-status species is Policy CE-7.1 which requires implementation of the CVMSHCP and other species protection regulations. Future development on the subject property under either land use designation would be subject to site plan reviews, mitigation measures, as applicable, and General Plan policies to ensure biological resources are protected. Therefore, impacts would be less than significant.

VENTANA Specific Plan

The Project proposes the development of a single-family residential development consisting of 103 homes, a dog park, pedestrian trails, and open space common areas, the construction of which will result in the direct disturbance and/or removal of soils, vegetation, and plant and animal species occupying the site.

Species Covered by CVMSHCP

The BRA identified 18 special-status species which have the potential to occur onsite. Four (4) of those species are fully covered and conserved through participation in the CVMSHCP: Mesquite Bosque (Mesquite Hummocks), Coachella giant sand treader cricket, western yellow bat, and Coachella Valley (Palm Springs) round-tailed ground squirrel. Potential impacts to these four species will be mitigated through participation in the CVMSHCP, including the payment of local development mitigation fees (Mitigation Measure BIO-1).

Species Not Covered by CVMSHCP

The following sensitive plant species have a low potential to occur onsite: *Astragalus sabulonum* (gravel milk-vetch), *Ditaxis claryana* (glandular ditaxis), *Euphorbia abramsiana* (Abram's spurge), *Johnstonella costata* (ribbed cryptantha), *Nemacaulis denudata var. gracilis* (slender cottonheads), and *Petalonyx linearis* (narrow-leaf sandpaper-plant). Due to the isolated nature of the site, and extensive disturbance due to past agricultural activities, the biologist determined that special-status plant species are not expected to occur onsite, and no further action is required. Impacts to these species will be less than significant.

No sensitive wildlife species (mammals, invertebrates, reptiles, amphibians) were observed or detected onsite during field surveys. The following sensitive wildlife species have a moderate or low potential to occur onsite: *Macrobaenetes valgum* (Coachella giant sand treader cricket), and *Nyctinomops femorosaccus* (pocketed free-tailed bat). Due to the unlikely potential for these species to occur onsite due to lack of suitable habitat as a result of site disturbance, the BRA determined no further action is required. Impacts to these species will be less than significant.

There are six (6) special-status bird species known to occur due to suitable or present nesting and foraging habitat onsite. These species include the *Calypte costae* (Costa's hummingbird), *Lanius ludovicianus* (loggerhead shrike), *Pyrocephalus rubinus* (vermilion flycatcher), *falco mexicanus* (prairie falcon), *Athene cunicularia* (burrowing owl), and *Polioptila melanura* (black-tailed gnatcatcher). A seventh species, *Phalacrocorax auritus* (double-crested cormorant), was observed passing over the site, however no nesting or foraging habitat was observed onsite during the field survey.

Although these bird species are not covered under the CVMSHCP, special protections are provided to them by the MBTA and state code. Nesting bird surveys in compliance with the MBTA will mitigate any potential Project-related impacts to these species (Mitigation Measure BIO-2). The surveys would determine whether nesting birds are present onsite immediately prior to site disturbance and, if present, prohibit project-related work within avoidance buffers until the young have fledged.

The burrowing owl is a covered species under the CVMSHCP, but the federal permit for the CVMSHCP does not allow take of this species under the MBTA. According to the CVMSHCP Section 9, Burrowing Owl (CVMSHCP page 9-143), projects not in a Coachella Valley MSHCP Conservation Area do not require burrowing owl protocol surveys (the site is not located in a conservation area). However, they are still required by law (CDFW codes and MBTA) to avoid take of burrowing owls. Protocols have been developed for burrowing owl surveys prior to ground disturbance. The biologist determined that the isolated nature of the site and the limited burrowing opportunities for the species on the site result in very low probability that the species would occur on the property. However, since it is possible for burrowing owl to locate on the property prior to Project development, project-related impacts to the species will be mitigated through implementation of Mitigation Measure BIO-3 which requires pre-construction surveys to identify any burrowing owls present onsite, and consultation with CDFW regarding the use of exclusion devices, if appropriate, to minimize impacts to the species.

With implementation of Mitigation Measures BIO-1 through BIO-3, potential Project-related impacts to sensitive species would be less than significant.

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

General Plan Amendment

The proposed General Plan Amendment would increase the development potential on the subject property from a maximum buildout of 45 dwelling units to 136 dwelling units, an increase of 91 units. The GPA does not propose new or revised goals, policies, or programs pertaining to the conservation of biological resources and, in that regard, would have no impact on the existing General Plan policies (including Goal CE-7, Policies CE-7.1 through CE-7.11, and Policy CE-4.2 which protects heritage trees). Implementation of either land use designation would result in similar impacts, insofar as either designation would result in site clearing for road improvements, house pads and common and retention areas, and future development on the subject property would be subject to site plan reviews, General Plan policies, and mitigation measures, as applicable, to ensure biological resources are protected. The GPU EIR determined that development facilitated by the GPU would not conflict with any policies or ordinances protecting biological resources and impacts would be less than significant. As the proposed GPA would result in no change to existing General Plan policies, and the physical impact of either land use designation would result in site clearing, impacts associated with the proposed GPA on local policies or ordinances protecting biological species would be less than significant.

Ventana Specific Plan
The proposed Specific Plan will not interfere with any City policies regarding the preservation of plants or animals. The Project is a "Covered Activity" under the CVMSHCP and future development resulting from the Specific Plan will be subject to CVMSHCP development mitigation fees prior to new ground disturbance to mitigate for potential project impacts and to further the implementation of the CVMSHCP.

The Project site does not contain any designated heritage trees that are subject to the City's tree preservation ordinance (Municipal Code Chapter 98.09). The proposed Project would also adhere to General Plan Policy CE-7.1 by ensuring development is consistent with federal, State, and regional regulations for habitat and species protection, and Policy CE-7.6 by using primarily native desert plant materials in landscaping and avoiding the use of invasive plant materials that are harmful to native plant and animal species. Therefore, the Proposed Project would not conflict with, but would rather adhere to local policies or ordinances protecting biological resources, and impacts will be less than significant.

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

General Plan Amendment
The site is not located in a Conservation Area as defined by the CVMSHCP, but future development onsite is subject to the payment of local developer mitigation fees, regardless of whether the General Plan land use designation is Desert Estates Neighborhood (existing) or Transitional Neighborhood (proposed). The General Plan Amendment does not propose a land use designation change that would convert protected or open space lands to urban uses. The GPU EIR determined that future development facilitated by the GPU would be required to adhere to policies that require CVMSHCP compliance, and impacts associated with GPU growth forecasts would be less than significant.

The proposed GPA would facilitate development of 91 dwelling units more than the current land use designation, a 0.2% increase over the number of dwelling units at GPU buildout (38,144 units). Development under either land use designation would be subject to the same provisions of the CVMSHCP. The GPA will not result in changes to GPU policies or compliance with the CVMSHCP. Therefore, the General Plan Amendment would not conflict with the provisions of an adopted Habitat Conservation Plan, and impacts would be less than significant.

VENTANA Specific Plan
The proposed Project is located in the City of Indio, which is within the boundaries of the CVMSHCP. The City is a signatory to the Plan, and is therefore responsible for implementing its provisions, which include new development projects being subject to payment of the Local Development Mitigation Fee, which will mitigate potential impacts to covered species. The site is not within or adjacent to a CVMSHCP-designated Conservation Area, so no additional

mitigation measures or provisions are required, as no impacts to conservation areas will occur. The Project will not conflict with any policies or ordinances that protect biological species, or any habitat conservation plans or natural community conservation plans. Impacts are expected to be less than significant.

2.6.7 Mitigation Measures

The proposed Project is expected to have a less than significant impact on biological resources. Compliance with the provisions and requirements of the CVMSHCP and the Migratory Bird Treaty Act will ensure that any potential impacts to sensitive species will be mitigated. The following mitigation measures ensure that impacts to biological resources will be less than significant.

BIO-1 The Project proponent shall be required to pay the CVMSHCP local development mitigation fee to mitigate for impacts to covered species and natural communities within the Project site.

BIO-2 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, 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 A qualified biologist shall conduct two (2) take avoidance pre-construction burrowing owl surveys onsite. The first shall occur between 14 and 30 days prior to ground disturbance, and the second shall occur within 24 hours of ground disturbance. If burrowing owls are detected, the project proponent shall consult with CDFW to determine what course of action is needed, such as the use of exclusion devices (if applicable) to discourage owls from using burrows that are believed to be in jeopardy of being impacted by implementation of the project.

2.6.8 Significance After Mitigation

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

2.6.9 Cumulative Impacts

The study area for the GPU EIR (page 5-11) assessment of cumulative impacts to biological resources was the Coachella Valley. The EIR determined that future development facilitated by the GPU could have a cumulative impact on biological resources through the loss of habitat and

land use adjacency impacts. However, adverse effects would be reduced through implementation of federal, state, and regional programs, compliance with CVMSHCP and GPU policies, and review by the City and other relevant agencies. Impacts would be reduced such that the GPU's contribution to cumulative biological resource impacts would not be cumulatively considerable. Compared to the GPU, maximum buildout of the proposed GPA would result in a 0.2% increase in the number of dwelling units and buildout of the VENTANA Specific Plan would result in a 0.3% increase, but both would result in the same ground surface disturbances as the current General Plan designation. The Project, therefore, would result in only a marginal increase in development that would not contribute considerably to cumulative impacts on biological resources in the Coachella Valley.

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

The Project site is not within any CVMSCHP designated Conservation Area and does not contain any wildlife movement corridors or linkages. It does not contain any riparian areas or jurisdictional water features. The site has been disturbed by agricultural activities and installation of irrigation systems, and it is completely surrounded by urban development. As such, onsite habitat quality has been degraded, and the potential for it to harbor sensitive species is very low to low. As described above, potential impacts to biological resources will be mitigated to less than significant levels. Therefore, the Project's impacts to biological resources will be less than significant, and the Project's contribution to cumulative impacts will not be cumulatively considerable.

2.7 Cultural Resources

2.7.1 Introduction

This section evaluates the potential for the proposed Project to result in adverse impacts to cultural resources. Cultural resources include Native American tribal cultural resources, unique paleontological or geological resources, archaeological resources, historic architectural resources, and human remains. Mitigation measures to reduce impacts to a less than significant level are identified, where appropriate. This section is based primarily on the City of Indio General Plan and EIR, and the Cultural Resources Survey report prepared for the Project by ASM Affiliates Inc. (ASM, 2020)[1], which is Appendix D of this EIR.

2.7.2 Thresholds of Significance

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

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

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

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

The Initial Study determined that the Project would result in "No Impact' for threshold question c) above. Therefore, it is not analyzed further in this EIR.

2.7.3 Regulatory Framework

Federal

National Historic Preservation Act

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

[1] "Cultural Resources Study for the Avenue 50 Indio Project, Indio, Riverside County, California," prepared by ASM Affiliates, Inc., March 13, 2020.

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

National Register of Historic Places

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

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

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

State

California Public Resources Code

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

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

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

Senate Bill 18

Senate Bill (SB) 18 recognizes that protection of traditional tribal cultural places is important to all tribes, whether federally recognized or not, and it provides all California Native American tribes with the opportunity to participate in consultation with city and county governments for this purpose (Governor's Office of Planning and Research [OPR] 2005). SB 18 establishes responsibilities for local governments to contact, provide notice to, refer plans to, and consult with tribes. The following list briefly identifies the contact and notification responsibilities of local governments, in sequential order of their occurrence:

- Prior to the adoption or any amendment of a general plan or specific plan, a local government must notify the appropriate tribes (on the contact list maintained by the NAHC) of the opportunity to conduct consultations for the purpose of preserving or mitigating impacts to cultural places located on land within the local government's jurisdiction that is affected by the proposed plan adoption or amendment. Tribes have 90 days from the date on which they receive notification to request consultation, unless a shorter timeframe has been agreed to by the tribe (Government Code §65352.3).
- Prior to the adoption or substantial amendment of a general plan or specific plan, a local government must refer the proposed action to those tribes that are on the NAHC contact list and have traditional lands located within the city or county's jurisdiction. The referral must allow a 45-day comment period (Government Code §65352). Notice must be sent regardless of whether prior consultation has taken place. Such notice does not initiate a new consultation process.
- Local governments must send notice of a public hearing, at least 10 days prior to the hearing, to tribes who have filed a written request for such notice (Government Code §65092).

On or after March 1, 2005, local governments must consult with tribes that have requested consultation in accordance with Government Code §65352.3. The purpose of this consultation is to preserve or mitigate impacts to cultural places that may be affected by a general plan or specific plan amendment or adoption.

SB 18 also amended Civil Code Section 815.3 and adds California Native American tribes to the list of entities that can acquire and hold conservation easements. Tribes on the contact list maintained by the NAHC now have the ability to acquire, on terms mutually satisfactory to the tribe and the landowner, conservation easements for the purpose of protecting their cultural places (OPR 2005).

Assembly Bill 52

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

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

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

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

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

California Register of Historical Resources

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

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

Local

City of Indio General Plan

The General Plan Conservation Element includes policies to ensure that impacts to historic and archaeological resources are taken into consideration and reduced or minimized in conjunction with future development. Relevant policies include the following:

Policy CE-8.1 Site Plan Review. Ensure adequate site plan review and mitigation measures are implemented for the development of sites with the potential to contain historic, archaeological, and paleontological resources.

Policy CE-8.2 Avoidance of Impacts to Historic Resources. For projects that could affect historic resources, ensure adequate study to identify eligible resources and project-level review to avoid or lessen negative impacts through conformance with the Secretary of the Interior's Standards for the Treatment of Historic Properties.

Policy CE-8.4 Monitoring. Require monitoring on sites where grading has the potential to impact subsurface cultural and paleontological resources during excavation and construction activities.

Policy CE-8.6 Coordination with local tribes. Periodically meet with representatives from local tribes to:

- Obtain input prior to making decisions, taking actions, or implementing programs/projects that may impact cultural resources;
- Discuss methods to preserve and protect highly sensitive cultural resources; and
- Ensure that there is agreement regarding the protocol to be followed when cultural resources are discovered.

2.7.4 Environmental Setting

Prehistoric Period

The City of Indio and the Coachella Valley are in the western end of the Colorado Desert. The earliest time period of human occupancy is arguably the Paleoindian (ca. 8,000 to 10,000 years ago), when small groups of hunters and gatherers used very simple stone tools. The population dwindled in the Early Archaic Period (ca. 8,000 to 4,000-years ago), though production and use of tools made of ground stone greatly expanded during this period. In the ensuing Late Archaic Period, small groups relied on opportunistic hunting and left prominent ground stone artifacts for food processing. The hunting livelihood continued into the Late Prehistoric Period (ca. 1500 years ago to the Spanish missions era), when ceramics and the bow/arrow were introduced into the region.

The Cahuilla

The Cahuilla people settled in the Coachella Valley approximately 2,000 to 3,000 years ago and lived on hunting and gathering under varying environmental conditions. They are generally divided into three groups by geographic setting: the Pass Cahuilla of the San Gorgonio Pass–Palm Springs area, the Mountain Cahuilla of the San Jacinto and Santa Rosa Mountains and the Cahuilla Valley, and the Desert Cahuilla of the eastern Coachella Valley. Amid the desert and mountains, the Holocene Lake Cahuilla provided abundant resources to nearby settlements. The Cahuilla hunted waterfowl and utilized elaborate stone fish traps when the lake was present, and relied on more terrestrial resources when it desiccated in the lacustral cycle. They hunted deer, antelope, bighorn sheep, rabbits, and wood rats with throwing sticks, clubs, nets, traps, and snares, as well as bow and arrow. A variety of lithic tools such as mortar and pestle, fire drill, awl, stone knives and scrapers, and containers like baskets and pottery vessels as well as wood, horn, and bone spoons and stirrers were employed in their subsistence.

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

Historic Period

The historic period began around 1799 with Spanish and Mexican expeditions moving through the Coachella Valley, with little actual settlement until the Sothern Pacific Railroad line was finished in 1876. As railroad lines and stations were completed, non-Indian settlement arrived in the Coachella Valley and expanded in the next decade after the Homestead Act, the Desert Land Act, and other federal land laws that opened public land for claims. Agriculture became the dominant economic activity with the development of extensive groundwater resources (mainly artesian wells).

Indio was one of the many railroad towns to emerge along the path of the new railway lines throughout Southern California. The Town of Indio was formally surveyed with a map filed in 1888. In the 1910s, with the arrival of electricity, and the water infrastructure slowly taking shape, Indio continued to expand and attract settlers. In 1930, Indio became one of the first cities in the Coachella Valley to be incorporated. The City of Indio continued to boom as the Coachella Valley developed into a premier winter retreat in Southern California.

2.7.5 Existing Conditions

The City of Indio and the Coachella Valley are the traditional home of the Cahuilla Indians, who had many villages throughout the valley. The areas with the highest number of archaeological resources in the City are known to occur within the ancient Lake Cahuilla shoreline. The Project site lies within the ancient Lake Cahuilla boundary. Although archaeological resources are much more likely to be encountered in undeveloped parcels of land, subsurface archaeological resources may be encountered in areas that have been developed or farmed but have not been subject to extensive subsurface disturbance (excavation).

A number of potential historic and prehistoric sites and structures have been recorded in the City. Established in 2008, the City of Indio Historic Resource List currently includes a total of 39 buildings that are eligible or potentially eligible as historic resources. An additional 19 properties are included on the City's list as warranting evaluation. None of the resources are located on the Project site. As described elsewhere in this EIR, the site is currently vacant, and does not include any structures.

Historical Records Search

On February 24 and March 2, 2020, ASM completed a records search at the Eastern Information Center (EIC), University of California, Riverside. The search was focused on a one-mile radius of the Project area and identified 66 previous reports that addressed areas within the search scope. None of these reports address areas that intersect with or overlap the Project area. EIC records indicate the presence of 73 previously recorded cultural resources outside of, but within a one-mile radius of the Project area. These resources consist predominantly of prehistoric sites or isolates consisting of three or less artifacts. Most of the prehistoric sites are characterized by sparse surficial, as well as sparse and relatively shallow subsurface deposits, many of which have been disturbed or destroyed by modern construction and development activities. Some remnants of historic debris scatter also occur infrequently within a one-mile radius of the Project area. These resources require no further consideration in the CEQA-compliance process for this Project due to their distance from the site and low cultural significance.

The California Register of Historic Resources (CRHR) and the National Register of Historic Places (NRHP) were also examined to identify any previously recorded cultural resources within one mile of the Project area. No historical addresses were identified as occurring within the one-mile records search radius.

Field Survey

On March 4, 2020, a field survey of the Project site was conducted by ASM archaeologists and a Native American monitor from the Torres-Martinez Desert Cahuilla Indians tribe. The majority of the site has been previously disturbed in association with agricultural use and recent plowing and grading. Large portions of the ground surface in the Project area were obscured by vegetation dominated by invasive grasses, which limited ground surface visibility to about 5% in those areas. Where ground surfaces were exposed, visibility was estimated at 85%. Highly fragmented ceramics and glass were sparsely distributed on the ground surface throughout the entire Project area and appear to be modern in nature. No buildings, structures, objects, sites, features, or artifacts of prehistoric or historical origin were encountered within the Project area during the field survey.

Native American Participation

On February 6, 2020, ASM submitted a written request to the State of California Native American Heritage Commission (NAHC) for a records search in the Sacred Lands File to inquire about known areas of cultural concern within or within one mile of the proposed Project. NAHC responded with a letter on February 21, 2020 stating that a search of the Sacred Lands File was negative but recommended contacting nineteen local tribal authorities regarding potential Native American Cultural resources. The City conducted Tribal Consultation in conformance with both SB 18 and AB 52 requirements. Two of the tribes responded in writing (see Appendix D), the Agua Caliente Band of Cahuilla Indians and the Campo Band of Mission Indians. Consultation meetings between City staff and representatives of both tribes were held, and are further described in Section 2.19, Tribal Cultural Resources.

2.7.6 Project Impacts

The following discussion evaluates the potential Project-related impacts to sensitive cultural resources, including historic and archaeological resources. Tribal cultural resources are discussed in detail in Section 2.19 of this EIR.

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

General Plan Amendment

The proposed General Plan Amendment would change the land use designation on the Project site from Desert Estates Neighborhood (up to 1 du/ac) to Transitional Neighborhood (0-3 du/ac), thereby increasing the development potential on the subject property from a maximum buildout of 45 dwelling units to 136 dwelling units. It would also revise the General Plan land use map and text accordingly. Amendments would apply only to the subject property. The GPA does not propose new or revised goals, policies, or programs pertaining to the preservation of historic resources and would have no impact on existing General Plan goals, policies, or programs (including Goal CE-8 and Policies CE-8.1 through CE-8.6). Future development on the subject property would be subject to site plan reviews and mitigation measures, as applicable. Coordination between the City and tribes would continue to be required for the protection of sensitive cultural resources.

According to the General Plan Update EIR (Figure 4.5-2), the City of Indio General Plan Update Draft Historic Resources Survey identified known historic resources, potential historic districts and local conservations zones, which are clustered in the center of the City. There are no identified or potential historic resources or districts/conservation zones on the subject property or its vicinity. The nearest identified historic resource is located approximately one mile to the northwest of the Project site, and the nearest potential historic district is approximately two miles to the northeast. The ASM records search and field survey, described in Section 2.7.5, also found no evidence of historic resources on the subject property. Therefore, the proposed General Plan Amendment would have no impact on the significance of a historical resource.

VENTANA Specific Plan

The proposed Specific Plan establishes development standards and design guidelines that would apply to the proposed Project on the subject property. It addresses required and preferred land uses, circulation, architecture, trails and open space and streetscapes, landscaping, signage, walls and fences, and green building and energy efficiency, and utility infrastructure. The Specific Plan is consistent with General Plan cultural resource goals and policies (see Specific Plan p. 45), and it does not propose new or revised standards or guidelines pertaining to historic resources.

As discussed in Section 2.7.5 above, no historical resources are present within the Project area. No historical resources exist within or adjacent to the Project site, and thus, implementation of the proposed Specific Plan will not cause a substantial adverse change to any known historical resources. No impact would occur regarding the significance of any historical resource in the Project area.

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

General Plan Amendment

The proposed GPA would increase the development potential of the subject property from 45 to 136 dwelling units and would revise the General Plan land use map and text by creating a new land use designation. Both the current General Plan designation and the proposed GPA would facilitate residential development that would result in grading, excavation, and other ground disturbances that could potentially uncover previously unknown archaeological resources. Although the proposed General Plan Amendment would apply a more intense land use designation to the Project site and increase residential density, it would not revise or otherwise impact General Plan goals, policies, or programs pertaining to archaeological resources. The proposed Project would still be subject to General Plan policies and applicable regulations. The General Plan EIR includes a mitigation measure (MM-CR-3) requiring an archaeological field survey or field monitoring in areas of moderate, moderate-high, and high sensitivity. In addition, the proposed Project would be subject to General Plan Policy CE-8.1, which guides development such that significant archaeological resources are avoided and, if avoidance is not possible, measures to mitigate significant impacts are conducted in accordance

with CEQA. Policy CE-8.4 would also apply and require the monitoring of sites where grading has potential to impact subsurface cultural resources to ensure that work would be halted if sensitive resources are identified.

As described previously, the ASM records search and field survey found no evidence of significant archaeological resources on the subject property. Much of the ground surface was previously disturbed by agricultural activity. However, the study determined that there is potential for archaeological materials to be present on the vegetated portions of the ground surface that were not visible during the field survey, and there is potential for subsurface deposits to be uncovered during ground disturbing activities during Project construction. Additionally, according to the General Plan Update EIR (Figure 4.5-1), the Project area has high sensitivity for prehistoric/ethnohistoric cultural resources. Future development consistent with the GPA could result in direct impacts to archaeological resources on the Project site. Impacts of the proposed GPA on archaeological resources would be less than significant with the implementation of Mitigation Measure CUL-1.

VENTANA Specific Plan
The proposed Specific Plan would establish development standards and design guidelines for future onsite improvements, such as buildings and infrastructure, but would not propose new or revised standards or guidelines pertaining to archaeological resources. With implementation of the Specific Plan, the proposed Project will continue to be subject to General Plan policies addressing preservation of archaeological resources and the recommendations of the ASM study.

As previously explained, no archaeological resources were observed during the site-specific cultural resources field survey or recorded during previous surveys. Highly fragmented ceramics and glass were sparsely distributed on the ground surface throughout the entire Project area; however, they appear to be modern in nature. Much of the ground surface was previously disturbed by agricultural plowing. However, it is possible that additional archaeological materials may be present that were not detected during the survey. Construction monitoring by a qualified archaeologist and Native American monitor is recommended for ground disturbing activities during construction (Mitigation Measure CUL-1). With the implementation of Mitigation Measure CUL-1, potential impacts associated with archaeological resources will be reduced to less than significant levels.

2.7.7 Mitigation Measures

As noted above, the Project will have no impact on historic resources, and the Project's potential impacts to cultural resources will be less than significant with the incorporation of the following Mitigation Measure.

CUL-1 Earth-moving activities including grading, grubbing, trenching, or excavations at the site shall be monitored by a qualified archaeologist and a Torres-Martinez DCI or ACBCI Native American monitor(s).

If any cultural materials more than 50 years of age are discovered, they shall be recorded and evaluated in the field. The archaeologist and monitors shall be prepared to recover artifacts quickly to avoid construction delays but shall have the power to temporarily halt or divert construction equipment to allow for controlled archaeological recovery if a substantial cultural deposit is encountered. On-site monitoring shall be coordinated with the nearest Native American groups who may wish to participate. The monitors shall determine when excavations have reached sufficient depth to preclude the occurrence of cultural resources, and when monitoring should conclude.

If artifacts are discovered, these shall be processed, catalogued, analyzed, and prepared for permanent curation in a repository with permanent retrievable storage that would allow for additional research in the future.

2.7.8 Significance After Mitigation

With the implementation of Mitigation Measure CUL-1, impacts to cultural resources will be less than significant.

2.7.9 Cumulative Impacts

Like other development projects in the City and region, the Project would convert a vacant parcel to urban uses. Grading, excavation, and other ground surface disturbances could uncover previously unknown archaeological resources and contribute incrementally to the cumulative discovery and potential loss of artifacts at the local and regional scale. The subject property was previously disturbed by agricultural use and plowing and, therefore, the potential to yield such resources is somewhat reduced. No historical resources have been identified onsite as listed or eligible for listing under the California Register of Historical Resources or the National Register of Historic Places. No archaeological resources have been identified onsite. The potential for buried artifacts or resources to be unearthed during Project development is low due to past and present conditions. Potential impacts, if any, will be mitigated to less than significant levels through implementation of the mitigation measure set forth above. Because site disturbance is to be monitored to assure that buried resources are protected, the implementation of the Project will not contribute to cumulative impacts associated with cultural resources, and such impacts will not be significant.

2.8 Energy Resources

2.8.1 Introduction

This section of the EIR describes existing conditions with regard to energy resources within the VENTANA Specific Plan Project planning area and analyzes the potential impacts of the Project on these resources. This analysis was prepared pursuant to Appendix G of the CEQA Guidelines, as amended. A wide range of data and information, ranging from research to regional scale planning and environmental documents, have been used in researching and analyzing the Project and its potential effects. Specifically, this section evaluates the demand for energy resources attributable to the Project during construction and operation, demonstrates whether the current and planned electrical, natural gas, and petroleum-based fuel supplies and distribution systems are adequate to meet the Project's forecasted energy consumption, and determines the impacts based on the Project's use and conservation of energy resources.

2.8.2 Thresholds of Significance

The following analysis criteria and thresholds are based on Appendix G and derived from Appendix F of State CEQA Guidelines. A project would have a significant impact relating to energy and mineral resources if it would:

Energy

a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation.

b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

2.8.3 Regulatory Framework

Federal

National Energy Policy Act of 2005

The National Energy Policy Act of 2005 sets equipment energy-efficiency standards, seeks to reduce reliance on nonrenewable energy resources, and provides incentives to reduce current demand on these resources. The act provides for incentives for high-efficiency (including electric) vehicles, new and existing homes, commercial buildings, and manufacturers of high-efficiency appliances. Additionally, the act addresses combined heat and power, appliance labeling, research and development, efficiency in federal and public facilities, building energy codes, public housing, and other efficiency topics.

State

California 2008 Energy Action Plan Update

The 2008 update to the 2005 Energy Action Plan II is the State's principal energy planning and policy document. The updated document examines the State's ongoing actions in the context of global climate change. The Energy Action Plan II continues the goals of the original 2003 Energy Action Plan, describes a coordinated implementation plan for state energy policies, and identifies specific action areas to ensure that California's energy resources are adequate, affordable, technologically advanced, and environmentally sound. In accordance with this plan, the first-priority actions to address California's increasing energy demands are energy efficiency and demand response (i.e., reduction of customer energy usage during peak periods to address system reliability and support the best use of energy infrastructure). Additional priorities include the use of renewable sources of power and distributed generation (i.e., the use of relatively small power plants near or at centers of high demand). To the extent that these actions are unable to satisfy the increasing energy demand and transmission capacity needs, clean and efficient fossil-fired generation is supported.

The California 2008 Energy Action Plan Update examines policy changes in the areas of energy efficiency, demand response, renewable energy, electricity reliability and infrastructure, electricity market structure, natural gas supply and infrastructure, research and development, and climate change.

Assembly Bill 32 (2006) and Senate Bill 32 (2016)

In 2006, the Legislature enacted AB 32, the California Global Warming Solutions Act of 2006. AB 32 requires California to reduce its GHG emissions to 1990 levels by 2020. In 2016, the Legislature enacted SB 32, which extended the horizon year of the state's codified GHG reduction planning targets from 2020 to 2030, requiring California to reduce its GHG emissions to 40% below 1990 levels by 2030. In accordance with AB 32 and SB 32, the California Air Resources Board (CARB) prepares scoping plans to guide the development of statewide policies and regulations for the reduction of GHG emissions. Many of the policy and regulatory concepts identified in the scoping plans focus on increasing energy efficiencies and the use of renewable resources and reducing the consumption of petroleum-based fuels (such as gasoline and diesel). As such, the State's GHG emissions reduction planning framework creates co-benefits for energy-related resources. Additional information on AB 32 and SB 32 is provided in Section 2.10, Greenhouse Gas Emissions, of this EIR.

California Building Standards

Part 6 of Title 24 of the California Code of Regulations was established in 1978 and serves to enhance and regulate California's building standards. Part 6 establishes energy efficiency standards for residential and non-residential buildings constructed in California to reduce energy demand and consumption. Part 6 is updated periodically to incorporate and consider new energy efficiency technologies and methodologies.

The 2019 Title 24 building energy efficiency standards, which became effective on January 1, 2020, further reduce energy consumption in the State. The 2019 edition is the last of three updates to move California toward achieving the Zero Net Energy (ZNE) goal by the year 2020. The 2019 update to the Building Energy Efficiency Standards focuses on several key areas to improve the energy efficiency of newly constructed buildings and additions and alterations to existing buildings. The most significant efficiency improvements to the residential Standards include the introduction of photovoltaic into the prescriptive package, improvements for attics, walls, water heating, and lighting. The most significant efficiency improvements to the nonresidential Standards include alignment with the ASHRAE 90.1 2017 national standards.

Title 24 also includes Part 11, the California Green Building Standards (CALGreen). The CALGreen standards took effect in January 2011 and instituted mandatory minimum environmental performance standards for all ground-up, new construction of commercial, low-rise residential, and State-owned buildings, as well as schools and hospitals. The 2019 CALGreen standards, effective on January 1, 2020, clarify and update many previously implemented regulations, including: Storm Water Pollution Prevention Plan; backlight, uplight and glare reference standards; showerhead flow rates; resilient flooring systems; Minimum Efficiency Reporting Value (MERV) ratings for air filters; and commissioning reference standards.

Integrated Energy Policy Report

The California Energy Commission (CEC) is responsible for preparing integrated energy policy reports, which identify emerging trends related to energy supply, demand, conservation, public health and safety, and maintenance of a healthy economy. The CEC's 2015 Integrated Energy Policy Report discusses the State's policy goal to require that new residential construction be designed to achieve zero net energy (ZNE) standards by 2020 and that new non-residential construction be designed to achieve ZNE standards by 2030.

Regional and Local

County of Riverside Climate Action Plan

Riverside County has adopted a climate action plan that quantifies the current level of GHG emissions in its jurisdiction and provides the approach and programs that will be pursued to reduce GHG emission in the long-term.[1] The 2019 Climate Action Plan (CAP) Update, approved on December 17, 2019, refines the County's efforts to meet greenhouse gas (GHG) reduction strategies, specifically for the years 2035 and 2050.[2] The 2019 CAP Update builds upon the GHG reduction strategies in the 2015 Climate Action Plan, and may expect adjustments to the post 2030 reduction targets based on State updates and guidance when the State sets new reduction goals.

1 County of Riverside Climate Action Plan, 2015.
2 County of Riverside Climate Action Plan Update, November 2019.

City of Indio General Plan

The Conservation Element of the City's General Plan 2040 addresses the conservation, development, and sustainable use of Indio's natural resources, including, but not limited to, water, soils, natural gas, fossil fuels, renewable energy sources, and mineral deposits. The Conservation Element includes the following relevant policies pertaining to energy resources:

Goal CE-3 Energy Efficiency, Conservation, and Renewables. Energy-efficient buildings and vehicles that use energy from renewable sources.

Policy CE-3.1 Regional energy leadership. Continue involvement with CVAG, Imperial Irrigation District, and the Desert Energy Cities Partnership and be a regional leader in energy conservation, efficiency, and renewables implementation. Seek opportunities to join a Community Choice Energy program.

Policy CE-3.2 Residential energy efficiency education. Maintain a designated City staff member to oversee an Energy Awareness Program that provides lectures, seminars, and training on green building.

Policy CE-3.6 Zero net energy use. Implement building design requirements to achieve zero net energy use for new residential development by 2020 and zero net energy use for new commercial development by 2030 consistent with the California Public Utilities Commission's California Long Term Energy Efficiency Strategic Plan.

Policy CE-3.7 Solar financing. Promote installation of solar panels by continuing to support Indio's Ygrene and HERO Programs and by distributing information on actual savings achieved by PV systems.

Policy CE-3.8 Building energy use. Encourage the use of building placement, design, and construction techniques to limit energy consumption, reduce the heat island effect, increase renewable energy use, and maintain solar access.

City of Indio Climate Action Plan

The City of Indio adopted the Climate Action Plan (CAP) (2019) as a roadmap for achieving community wide GHG emissions reductions. Indio's CAP provides clear policy guidance to City staff and decision-makers and identifies a pathway to reduce greenhouse gas emissions consistent with State-level emissions reduction targets for 2020 and 2030. This path includes strategies for improving connectivity and land use patterns, improving transportation modes and systems, incorporating energy efficiency standards, increasing the City's renewable energy supply, and reducing solid waste.

2.8.4 Environmental Setting

Primary energy sources include nuclear energy, fossil energy (oil, coal and natural gas), and renewable sources such as wind, solar, geothermal, and hydropower. These primary sources are converted to electricity, a secondary energy source, which flows through power lines and other transmission infrastructure to end users.

The Coachella Valley is an important region for energy production from renewable resources. Energy resources are becoming more distributed in the valley, with wind turbine development focused in the San Gorgonio Pass area and geothermal at the south end of the Salton Sea. Solar photovoltaic systems are being developed throughout the valley.

Electricity

Electricity, a consumptive utility, is a man-made resource. The delivery of electricity involves a number of system components, including substations and transformers that decrease transmission line power (voltage) to a level appropriate for on-site distribution and use. Conveyance of electricity through transmission lines is typically responsive to demand. The production of electricity requires the consumption or conversion of energy resources (e.g., water, wind, oil, gas, coal, solar, geothermal, and nuclear resources) into electric energy. In California, the main sources of electric generation are natural gas (42.97%), renewables (32.09%), large-scale hydro (16.53%), and nuclear (8.06%). Renewables including biomass, geothermal, small hydro, solar, and wind, make up 32.09% of all sources of in-state electric power.[3]

Energy capacity, or electrical power, is generally measured in watts, while energy use is measured in watt-hours. Residential, commercial, and industrial sectors are the three main consumers of electricity. According to the California Energy Commission (CEC), statewide electricity consumption in 2019 was approximately 279,401.9 GWh which will increase to a high of 321,300 GWh in 2030.[4,5] The Statewide Electricity Annual Consumption per capita is also projected to grow from approximately 7,300 kWh in 2019 to a high of approximately 8,050 kWh in 2030.[6] The average annual electricity demand growth in California from 2016 to 2030 is expected to range from 0.99 to 1.59 percent, while peak annual electricity demand growth is expected to range from 0.30 to 1.52 percent from 2017 to 2030.[7]

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[3] 2019 Total System Electric Generation by California Energy Commission, https://www.energy.ca.gov/data-reports/energy-almanac/california-electricity-data/2019-total-system-electric-generation, accessed January 14, 2021.

[4] California Energy Consumption Database, Electricity Consumption (GWh), http://www.ecdms.energy.ca.gov/Default.aspx, accessed January 14, 2021.

[5] Adopted 2019 Integrated Energy Policy Report, California Energy Commission, February 20, 2020.

[6] California Energy Demand 2018-2030 Revised Forecast, California Energy Commission, February 2018. Figure 3.

[7] California Energy Demand 2018-2030 Revised Forecast, California Energy Commission, February 2018. Table ES-1.

Natural Gas

Natural gas is a combustible mixture of simple hydrocarbon compounds (primarily methane) that is used as a fuel source. Natural gas consumed in California is obtained from naturally occurring reservoirs, mainly located outside the State and delivered through high-pressure transmission pipelines. The natural gas transportation system is a nationwide network, and therefore, resource availability is typically not an issue. Natural gas satisfies almost one-third of the State's total energy requirements and is used in electricity generation, space heating, cooking, water heating, industrial processes, and as a transportation fuel. Natural gas is measured in terms of cubic feet. According to the CEC, statewide natural gas consumption in 2019 is projected to be approximately 13,000 MM therms and will drop to just less than 12,800 MM therms in 2030, both in the mid-demand scenario.[8]

Wind Energy

The Coachella Valley region has seen major developments in wind energy; the region is known internationally for the scale of wind resource development. The western Coachella Valley is a proven wind resource area, where strong and sustained winds are channeled through the San Gorgonio Pass and into the valley. Today, the San Gorgonio Pass is home to one of the nation's largest wind farms; it includes 1,603 wind turbines, with a total capacity of 609 megawatts.[9]

Solar Energy

The Coachella Valley region is a growing source of electricity generated by solar photovoltaic systems, which are being developed on residential rooftops, commercial and industrial buildings, institutional uses, and covered parking structures.

Geothermal Energy

Geothermal energy is produced by the heat of the earth and is often associated with volcanic or seismically active regions. California contains the largest amount of geothermal electric generation capacity in the United States. There are a total of 43 operating geothermal power plants in California with an installed capacity of 2,730.5 megawatts.[10] Approximately 10,943 gigawatt-hours (GWh) of electricity was produced from geothermal sources in California in 2019.[11]

The northwestern portion of the Coachella Valley contains limited geothermal resources, including hot springs in Palm Springs and Desert Hot Springs. These hot water areas result from faults and are primarily focused along the Mission Creek fault but also along the Palm Canyon fault. The geothermal energy produced in Palm Springs and Desert Hot Springs is generally used for commercial spas and therapeutic pools. These resources are limited, located on private

8 Adopted 2019 Integrated Energy Policy Report, California Energy Commission, February 20, 2020.
9 United States Wind Turbine Database, USGS Energy Resources, January 2021, https://eerscmap.usgs.gov/uswtdb/viewer/#9.5/34.0321/-116.801, accessed January 14, 2021.
10 California Geothermal Energy Statistics & Data, California Energy Commission website, https://ww2.energy.ca.gov/almanac/renewables_data/geothermal/index_cms.php, accessed January 2021.
11 Ibid.

lands, and not used for energy production. Geothermal energy on a utility scale has been found and developed at the south end of the Salton Sea in Imperial County, where 721.4 megawatts of geothermal electric power have been developed.[12]

Transportation Energy

According to the CEC, transportation accounted for 41.4% of California's total energy consumption in 2017 and approximately 50% of the State's greenhouse gas emissions.[13] The State is now working on developing flexible strategies to reduce petroleum consumption. Over the last decade, California has implemented several policies, rules, and regulations to improve vehicle efficiency, increase the development and use of alternative fuels, reduce air pollutants and GHGs from the transportation sector, and reduce vehicle miles traveled (VMT). Accordingly, gasoline consumption in California has declined. The CEC predicts that the demand for gasoline will continue to decline over the next ten years and there will be an increase in the use of alternative fuels, such as natural gas, biofuels, and electricity.

According to the CEC, the gasoline demand forecast ranges from 12.3 billion to 12.7 billion gallons in 2030, depending on the case.[14] The current statewide diesel consumption is projected to increase to 4.7 billion gallons in 2030.[15]

2.8.5 Existing Conditions

Electricity

The Project site is located within the Imperial Irrigation District (IID) service area which covers 6,611 square miles, including all of Imperial County along with parts of Riverside and San Diego counties. As of December 2019, IID serves 156,715 electric accounts with 4,404 miles of overhead distribution and 1,744 miles underground. In 2019, IID's energy portfolio included 66 megawatts of geothermal, representing 13 percent of IID's total energy load. The district met its renewable portfolio standards compliance goals in 2019 of 31% and continues to consider new renewable resources.[16] A low-income community solar project under the partnership of IID and Citizens Energy Corporation was commissioned in September 2019, serving more than 12,000 electric customers in IID's service area. The project is generating 30 megawatts of power for IID under a 23-year purchase power agreement.

[12] Ibid.
[13] p. 4, Adopted 2019 Integrated Energy Policy Report (IEPR), California Energy Commission.
[14] P. 72, Revised Transportation Energy Demand Forecast, 2018-2030, California Energy Commission, February 2018.
[15] P. 73, Revised Transportation Energy Demand Forecast, 2018-2030, California Energy Commission, February 2018.
[16] Imperial Irrigation District Annual Report, 2019.

The CEC estimated that the total electricity consumption for Riverside County was 15,520.13 million kWh in 2019.[17] According to the Indio CAP, the City's 2010 electricity consumption was 644,035,000 kWh. The IID load for 2019 was 3,325,115 megawatt hours.[18] According to the 2018 IID Integrated Resource Plan, the 2018 Load Forecast study projects an average annual growth rate of 1.2 percent for the first ten years (2018-2027) and 1.7 percent for the second ten years (2028-2037). The lower average annual growth rate of 1.2 percent in 2018-2027 is mainly due to fast growth of energy efficiency and rooftop/customer solar impact, which takes away some growth rate of IID system load. The higher rate in 2028-2037 is partly due to the energy efficiency and rooftop solar impact reaching market saturation.

IID has extensive transmission and subtransmission lines in Indio. In the Project area, IID has existing facilities aboveground on the north side of Avenue 50 and underground on the south side. The Project site is currently vacant and does not generate any demand for electricity; projected Project-related consumption at build out is discussed in Section 2.8.6, Project Impacts.

Natural Gas

Natural gas is provided to the City of Indio by the Southern California Gas Company (SoCalGas). The service territory of SoCalGas encompasses approximately 24,000 square miles in diverse terrain throughout central and southern California, from the City of Visalia to the Mexico border.[19] SoCalGas receives gas supplies from several sedimentary basins in the western United States and Canada, as well as local California supplies.[20]

Natural gas for SoCalGas is delivered to the region through interstate pipelines. Natural gas supplies are transported from Texas to the Coachella Valley through three east-west trending gas lines, which cross the Valley near and parallel to Interstate-10 and continue west to Los Angeles. In the Project area, SoCalGas has existing underground pipelines on the south side of Avenue 50.

According to the Indio Climate Action Plan, city-wide natural gas consumption totaled 1,117,040 therms in 2010.[21] This includes natural gas consumed by residential, commercial, and industrial land uses. The report has not been updated, and a more recent estimate is not currently available. However, similar to statewide predictions, it can be assumed that the annual consumption of natural gas per capita within the City of Indio will be comparable to

[17] Total electricity consumption for 2019, California Energy Consumption Database for Riverside County, California Energy Commission.

[18] Imperial Irrigation District Annual Report, 2019.

[19] Company Profile, SoCalGas website, https://www.socalgas.com/about-us/company-profile, accessed January 2021.

[20] 2014 California Gas Report, SoCalGas website, https://www.socalgas.com/regulatory/documents/cgr/2014-cgr.pdf, accessed January 2021.

[21] Indio Climate Action Plan, adopted September 18, 2019.

2010 or even decline like the statewide trend since the late 1990s. Currently, the Project site generates no demand for natural gas; projected Project-related demand at build out is discussed in Section 2.8.6, Project Impacts.

Transportation Energy

Most energy for transportation is provided by petroleum in the form of gasoline and diesel fuel. Petroleum accounts for more than 90 percent of California's transportation energy sources.[22] Alternative fuels such as ethanol, natural gas, biodiesel, hydrogen, and electricity are also used for transportation. According to the Indio CAP, the 2010 community wide vehicle miles traveled (VMTs) was approximately 262 million miles. While residential development proposed by the Project may result in an increase in VMTs compared to current conditions, there is an ongoing trend that higher fuel efficiency technologies and standards result in less fuel consumption for the same or even higher VMTs. In addition, the proposed Project is an infill development near existing commercial and other community services, and thus is not expected to have significant impacts on Project area VMTs (see Section 2.18, Transportation and Traffic, for more analysis of VMTs).

2.8.6 Project Impacts

a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation.

General Plan Amendment

The proposed GPA would change the land use designation of the Project site from Desert Estates Neighborhood (up to 1 du/ac) to Transitional Neighborhood (0-3 du/ac), thereby increasing the development potential on the subject property from a maximum buildout of 45 dwelling units to 136 dwelling units. It would also revise the General Plan land use map and text accordingly. However, the GPA does not propose new or revised goals, policies, or programs pertaining to energy resources, and the Project would still be required to adhere to current General Plan policies. The General Plan Update (GPU) EIR stated that, although exact details of the development projects implemented in accordance with the GPU are not known at this time, there are no conditions in the General Plan planning area that would require non-standard equipment or construction practices that would increase fuel-energy consumption above typical rates (Page 8-14). Further, many General Plan policies, as enumerated in Section 2.8.3 above, intend to reduce energy use through energy conservation, and sustainable building practices for new developments. Therefore, the General Plan would not result in a wasteful and inefficient use of nonrenewable resources during the construction of future development, and impacts would be less than significant.

[22] "California Fuel Facts," Western States Petroleum Association (WSPA), April 2017.

The proposed GPA would change the designation of the Project site and allow an additional 91 units to be developed. The new designation, Transitional Neighborhood (up to 3 du/ac), is considered a bridge between the low-density and high-density residential designations in the General Plan. It would be subject to all applicable General Plan policies, and therefore, impacts regarding short term construction energy consumption would be consistent with those identified for the General Plan, and be less than significant.

Regarding long term operations, the GPU EIR concluded that by implementing the General Plan's goals and policies, along with CAP measures, the GPU would promote energy and water conservation while focusing development in proximity to existing population and transit routes using mixed-use and infill development. While the GPA would create a new designation for the Project site, as noted above, it will still comply with all applicable General Plan policies and programs and CAP measures. The Project site is an infill site and close to existing population and commercial uses and transit routes. Implementation of the GPA would not result in the wasteful and inefficient use of nonrenewable resources associated with construction activities or long-term growth.

The 2019 California Green Building Code requires all residential homes built after 2020 to be zero-net-energy. These requirements assure that future buildings on the site will not waste energy. According to the CalEEMod outputs for the proposed Project (see Appendix B), full buildout of the proposed GPA would consume approximately 1,185,440 kWh of electricity per year. Assuming the electricity consumption is proportional to the number of dwelling units, the proposed GPA would result in an additional electricity consumption of 793,199 kWh for the additional 91 units allowed. This represents 0.12% of 2010 City-wide kWh usage (see Section 2.8.5, Electricity, above). Similarly, full buildout of the proposed GPA would consume approximately 41,611 therms of natural gas per year, which is an additional 27,843 therms for the additional 91 units allowed and represents less than 2.5% of 2010 City-wide therm usage (see Section 2.8.5, Natural Gas, above). The GPA would not cause new or increased severity of impacts regarding long term operations.

VENTANA Specific Plan

Construction Energy Demand:

During Project construction, energy would be consumed in three general forms:

(1) petroleum-based fuels used to power off-road construction vehicles and equipment, construction worker travel to and from the Project site, and delivery and haul truck trips (e.g., hauling of demolition material to off-site reuse and disposal facilities);
(2) electricity associated with the conveyance of water that would be used during Project construction for dust control (supply and conveyance) and electricity to power any necessary lighting during construction, electronic equipment, or other construction activities necessitating electrical power; and
(3) energy used in the production of construction materials, such as asphalt, steel, concrete, pipes, and manufactured or processed materials such as lumber and glass.

Electricity consumed during Project construction would vary throughout the construction period based on the construction activities being performed. Activities requiring electricity could include powering outdoor security or worksite lighting, operation and charging of electronic equipment, and powering a temporary worksite office or trailer. Such electricity demand would be temporary, nominal, and would cease upon the completion of construction. Overall, electricity will not be the primary energy source used during construction. Construction of the proposed residential development typically would not involve the consumption of natural gas.

Fuel consumed by construction equipment, such as gasoline and diesel, would be the primary energy resource expended over the course of construction. As discussed in Section 2.10 Greenhouse Gas Emissions, construction components including equipment, fuels, materials, and management practices, would be subject to current SCAQMD rules and regulations such as source-specific standards that reduce the greenhouse gas content in engines and limit equipment idling durations. The Project will also adhere to the required state Low Carbon Fuel Standard for construction equipment and heavy-duty vehicle efficiency standards. These standards will reduce wasteful fuel consumption and help maximize fuel efficiency, which in turn reduce emissions.

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. According to the CalEEMod outputs in Appendix B, generated for Project-specific air quality analysis, it is assumed that worker trip lengths are 11 miles, vendor trip lengths are 5.4 miles, and hauling trip lengths are 20 miles. Based on the number of trips required to complete Project construction that were generated by the CalEEMod software, combined VMTs for workers, vendors, and hauling are projected to be 187,728 miles. This represents 0.07% of the 262 million city-wide VMT in 2010 (see Section 2.8.5, Transportation, above), and represents a finite number of vehicle trips that will end once construction is complete. Because it is assumed that most construction workers will live locally, it is reasonable to assume that these VMTs have already been accounted for in the community wide VMT assumptions for worker commutes, insofar as these workers currently commute to other job sites, and do not constitute a new source of VMTs. Long-term operation of the Project will result in additional VMTs, as discussed below under “Operational Energy Demands.”

Overall, petroleum and diesel use during construction would be temporary and minimal and would not be wasteful or inefficient.

Operational Energy Demand:
During operation of the Project, energy would be consumed for multiple purposes including, but not limited to, heating/ventilating/air conditioning (HVAC), building and site lighting, and use of electricity and natural gas for household activities such as kitchens and swimming pools. Energy would also be consumed for vehicle trips. All homes will be constructed in accordance

with the Building Code, California Green Building Code, and Energy Code in effect at the time that development occurs, to ensure the most efficient construction/building technologies are used. Compliance with these codes and standards will benefit overall building operations, ensure energy efficiency, and reduce wasteful and unnecessary consumption of energy resources. The 2019 California Green Building Code requires all residential homes built after 2020 to be zero-net-energy. These requirements assure that future buildings on the site will not waste energy. According to the CalEEMod outputs for the proposed Project (see Appendix B), at buildout, the Project would consume approximately 897,797 kWh of electricity per year. This represents 0.14% of 2010 City-wide kWh usage (see Section 2.8.5, Electricity, above). Actual consumption may be reduced by onsite use of solar energy systems, heat pumps, and energy-efficient appliances. Project-related impacts regarding electricity consumption will be less than significant.

Operation of the proposed Project would consume natural gas for heating, cooking, and domestic hot water. 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. According to the CalEEMod outputs, operation of the Project would consume approximately 31,522 therms of natural gas per year, which is equivalent to 2.8% of 2010 City-wide therm usage (see Section 2.8.5, Natural Gas, above). The Specific Plan (Section III-F) describes energy savings that can be achieved by using induction cooking stoves and heat pumps instead of natural gas appliances. Use of such products onsite may decrease overall natural gas consumption. The Project will not result in wasteful, inefficient, or unnecessary consumption of natural gas energy resources during project operation. Impacts will be less than significant.

During operation, the Project is projected to generate 2,168,407 vehicle miles traveled to and from the Project site[23], resulting in the consumption of petroleum-based fuels. This represents a 0.8% increase from the 2010 city-wide VMT (see Section 2.8.5, Transportation, above). Operational VMT is primarily from future Project residents, as well as visitors from the local area and out-of-town. It should be noted that VMTs are regional in nature, and that not all Project VMTs will occur solely within the City's boundaries.

The Environmental Protection Agency (EPA) and CARB set forth up-to-date vehicle fuel efficiency standards to reduce vehicle emissions. Increased fuel efficiency means less fuel energy consumed per mile traveled. Although the Project will increase VMTs, it will not interfere with increased fuel efficiency standards and will not result in wasteful, inefficient, or unnecessary consumption of transportation energy resources during operation. Impacts would be less than significant.

b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

[23] CalEEMod outputs (see Appendix B).

General Plan Amendment

The proposed GPA would create a new land use designation (Transitional Neighborhood, 0-3 du/ac) and apply it to the Project site, and would update the General Plan land use map and text accordingly. However, the GPA would not result in new or revised General Plan or Climate Action Plan policies or strategies related to renewable energy or energy efficiency. As with the current General Plan land use designation (Desert Estates Neighborhood, up to 1 du/ac), the Project will still be subject to all applicable General Plan policies, Climate Action Plan strategies and actions, and all applicable State standards enforced by the City. The General Plan contains Goal CE-3: Energy Conservation and Policies CE-3.1 and CE-3.6 that promote energy and resource-conserving designs and techniques. The GPU EIR stated that future development under the GPU would be required to comply with the most current Title 24 Energy Efficiency Standards (Energy Code) and Green Building Standards (CalGreen) (Page 8-14). Therefore, the GPA would result in less than significant impacts related to compliance with applicable energy standards.

VENTANA Specific Plan

Section III.F of the proposed Specific Plan addresses green building and energy efficiency strategies to be implemented by the proposed Project. It promotes passive and active solar building design that can accommodate solar energy systems, and the use of energy-efficient appliances and all-electric homes. Section III.C encourages the use of drought-tolerant landscaping with native plants that minimize the need for watering. As explained in Specific Plan pages 44 and 45, the Specific Plan is consistent with General Plan Goal CE-3 and policies 3.6, 3.7, and 3.8, which address zero net energy use for new residential development, solar financing, and building placement, design, and construction techniques that limit energy construction. It is also consistent with Climate Action Plan implementation actions, including those pertaining to residential solar programs, net zero buildings, landscape and water conservation, and complete streets and pedestrian/bicycle infrastructure.

The proposed Project would be designed, built and operated in accordance with all applicable regulations pertaining to renewable energy and energy efficiency in its design, construction, and operation. The Project would follow the 2019 California Green Building Code and 2019 Energy Code to ensure the most efficient construction/building technologies are used to benefit overall building operations in the long term. The proposed homes are designed to be zero-net-energy as required by the 2019 Green Building Code. 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, impacts related to compliance with applicable energy standards are expected to be less than significant.

2.8.7 Mitigation Measures

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

2.8.8 Significance After Mitigation

Project-level energy impacts would be less than significant.

2.8.9 Cumulative Impacts

Potential cumulative impacts on energy resources would result if the proposed Project, in combination with past, present, and future projects, would result in the wasteful or inefficient use of energy. This could result from development that would not incorporate sufficient building energy efficiency features or achieve building energy efficiency standards, or that would result in unnecessary use of energy during construction and/or operation. Projects within the areas served by the energy service providers would be applicable to this analysis. Projects that include development of large buildings or other structures that would have the potential to consume energy in an inefficient manner would have the potential to contribute to a cumulative impact. Projects that involve major construction, such as transportation infrastructure, could also contribute to a cumulative impact; however, the impact of these projects would be limited because they would typically not involve substantial ongoing energy use.

Like most active development projects in the City and Coachella Valley region, the proposed Project would result in an increase in the consumption of electricity, natural gas, and transportation-related energy. The Project would contribute incrementally to local and regional increases in energy consumption. However, it would not result in wasteful, inefficient, or unnecessary use of energy due to design features, insofar as it will be required to install energy-efficient appliances and efficient water fixtures, and the offset of electrical energy usage and zero-net-energy design through the installation of PV solar panels. Similar to the proposed Project, future projects would be subject to the California Green Building Code (CALGreen), an evolving set of energy efficiency standards for commercial and residential buildings implemented to minimize the wasteful and inefficient use of energy. In addition to CALGreen's increasingly stringent standards, projects would be required to meet or exceed the Title 24 building standards, further cutting the inefficient use of energy.

Future development would be subject to even more stringent requirements, such as the objectives set in the AB 32 Scoping Plan (CARB 2017) that would seek to make all new commercial buildings zero net energy (ZNE) consumers by 2030.[24] Furthermore, many federal, state, and local regulations would aim to reduce the transportation fuel demand of cumulative projects and thus reduce cumulative energy demand of the projects. Therefore, the cumulative impacts of the proposed Project on energy resources are considered less than significant.

[24] Zero Net Energy, California Public Utilities Commission Energy Division; http://www.cpuc.ca.gov/ZNE/, accessed January 2021.

2.9 Geology and Soils

2.9.1 Introduction

This section of the EIR describes existing conditions with regard to geology and soils within the Project planning area and analyzes the potential impacts of regional and local geology and soils to the proposed Project. A wide range of data and information, ranging from research and subsurface borings conducted on the Project site to regional-scale planning and environmental documents, have been used in researching and analyzing the Project and its potential effects. These include detailed analysis of regional and local geology, soils, and seismic conditions.

2.9.2 Thresholds of Significance

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

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

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

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

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

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

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

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

The Initial Study determined that the Project would result in “No Impact” for threshold questions a)i, iii, iv, c), d) and e) above. Therefore, they are not analyzed further in this EIR.

2.9.3 Regulatory Framework

State

Seismic Hazards Mapping Act

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

Like the Alquist-Priolo Act, the Seismic Hazards Mapping Act of 1990 is intended to reduce damage resulting from earthquakes and California cities and counties are required to regulate development within mapped Seismic Hazard Zones. Under the Seismic Hazards Mapping Act, permit review is the primary mechanism for local regulation of development. Specifically, cities and counties are prohibited from issuing development permits for sites within Seismic Hazard Zones until appropriate site-specific geologic and/or geotechnical investigations have been conducted and measures to reduce potential damage have been incorporated into the development plans. A site-specific geotechnical investigation was conducted on the Project site in November 2019[1], which includes analysis of the seismic hazard onsite and appropriate design parameters for the Project.

California Building Codes

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

The 2019 CBC is based on the 2018 International Building Code (IBC) published by the International Code Conference. In addition, the CBC contains necessary California amendments that are based on the American Society of Civil Engineers (ASCE) Minimum Design Standards 7-05. ASCE 7-05 provides requirements for general structural design and includes means for determining earthquake loads, as well as other loads (e.g., flood, snow, wind) for inclusion in

[1] "Geotechnical Investigation, Proposed Residential Development Avenue 50 East of Jefferson Street APNs 602-070-004, 602-080-001 & 602-080-002, Indio, California" Sladden Engineering, November 2019 (Appendix G).

building codes. The provisions of the CBC apply to the construction, alteration, movement, replacement and demolition of every building or structure or any appurtenances connected or attached to such buildings or structures throughout California. The earthquake design requirements take into account the occupancy category of the structure, site class, soil classifications, and various seismic coefficients, all of which are used to determine a Seismic Design Category (SDC) for a project. The SDC is a classification system that combines the occupancy categories with the level of expected ground motions at a given site, and ranges from SDC A (very small seismic vulnerability) to SDC E/F (very high seismic vulnerability and near a major fault). The Project site is classified as SDC D.[2] Design specifications are then determined according to the SDC.

California Code of Regulations, Title 14, Division 2, Chapter 8, Article 10

These regulations govern the exercise of city, county and state agency responsibilities to identify and map seismic hazard zones and to mitigate seismic hazards to protect public health and safety in accordance with the provisions of Public Resources Code, Section 2690 et seq. (Seismic Hazards Mapping Act). [3]

Regional and Local

County of Riverside General Plan[4]

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

City of Indio General Plan

The City's General Plan includes goals and policies relevant to issues of seismic safety, geotechnical conditions, and paleontological resources. These include best practices to reduce soil erosion from wind and water, requiring technical studies in hazard-prone areas, and minimizing impacts from future hazards by preparation, information and education, and mitigation. The following policies are relevant to the proposed Project:

Safety Element

Policy SE-4.1 Development Plan Review. Require all new structures to be designed in accordance with the most recent California Building Code adopted by City Council, including the provisions regarding seismic loads, lateral forces and grading and not built across the trace of an active fault.

[2] Ibid.

[3] "Guidelines For Evaluating And Mitigating Seismic Hazards in California", Special Publication 117, 2008.

[4] Riverside County General Plan Update GPA No. 960 and Eastern Coachella Valley Area Plan, 2015.

Policy SE-4.2 Technical Reports. Require submittal of applicable geotechnical reports prepared by qualified professionals as part of the development review process.

Conservation Element

Policy CE-6.1 Grading. Minimize grading of land to project specific efforts so as to limit the impact of soil erosion from wind, water, and landslides in areas of unstable slopes, and reduce negative aesthetic impacts in areas of significant landforms.

Policy CE-8.1 Site Plan Review. Ensure adequate site plan review and mitigation measures are implemented for the development of sites with the potential to contain historic, archaeological and paleontological resources.

Policy CE-8.4 Monitoring. Require monitoring on sites where grading has the potential to impact subsurface cultural and paleontological resources during excavation and construction activities.

2.9.4 Environmental Setting

Regional Geologic Setting

The proposed Project lies within the Salton Trough, a tectonic depression formed by regional faulting. The Salton Trough is roughly 130 miles long and 70 miles wide and extends from the San Gorgonio Pass to the Gulf of Mexico. The Salton Trough is dominated by several northwest trending faults, most notably the San Andreas Fault system. The San Andreas Fault forms the tectonic boundary between the Pacific and North American tectonic plates, which are sliding past one another at a rate of about 50 millimeters per year. It is a complex strike-slip fault that represents a continuous zone of faulting from the San Francisco area to the Salton Sea. Approximately 70% of the movement between these plates is accommodated by the San Andreas Fault.[5] Given the valley's proximity to this and other active and potentially active faults, the composition of underlying soils, the presence of strong sustained winds, and steep and rugged mountains, this region is highly susceptible to seismic and other geologic forces. These issues are further addressed below and in the geotechnical report prepared on the subject property (Appendix G).

Regional Soils and Surficial Rocks

The City of Indio is located in the Coachella Valley, which is bounded by the Little San Bernardino Mountains on the north and northeast, and the Santa Rosa and San Jacinto Mountains on the southwest and west, respectively. The mountains surrounding the Coachella Valley are composed primarily of Precambrian metamorphic and Mesozoic granitic rock.

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

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

2.9.5 Existing Conditions

The Project site is located in the Coachella Valley which is a deep fault graben formed by tectonic movement along the San Andreas Fault system.[6] The motion accommodated by the fault is distributed along a complex system of interrelated faults.[7] According to recent geophysical data, the southern segment of the fault accommodates approximately 21-25 mm/year of slip between the Pacific and North American plates.[8] At its southern terminus, the southern segment steps west over to the Imperial fault, creating the Salton pull-apart (extension) basin through a releasing bend in the right-lateral system. This movement has created a spreading zone in the valley and causes ongoing subsidence in the Salton Trough. The southern segment is located approximately 5.4 miles northeast of the Project site and has the potential of generating a maximum magnitude 7.2 earthquake.[9]

The Coachella Valley is the northwestern extension of the Salton Trough, which is an internally draining area with no readily available outlet to the Gulf of California and with portions well below sea level (253 feet below mean sea level). The region is intermittently blocked from the Gulf of California by the damming effects of the Colorado River delta. Between about 300 AD and 1600 AD (to 1700), the Salton Trough was inundated by the river's water, forming ancient Lake Cahuilla (maximum elevation at 58 feet above mean sea level). Since that time the floor of the Trough has been repeatedly flooded with other freshwater lakes, the most recent and historically long lived being the current Salton Sea. The sole outlet for these waters is evaporation, leaving behind vast amounts of terrestrial sediment materials and evaporite minerals.

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

7 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.

8 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.

9 "Geotechnical Investigation, Proposed Residential Development Avenue 50 East of Jefferson Street APNs 602-070-004, 602-080-001 & 602-080-002, Indio, California" Sladden Engineering, November 2019 (Appendix G).

Geologic units are typically described in terms of their age, and in the Coachella Valley, they range from recently deposited gravels and sands, to granitic and metamorphic rocks formed hundreds of millions of years ago. Sediments from the surrounding mountain ranges are carried into and across the Coachella Valley through numerous seasonal streams flowing to the Whitewater River, San Gorgonio River and the Snow, Chino Canyon, Tahquitz, Palm Canyon, Deep Canyon, Mission, Big Morongo, and Little Morongo Creeks. Episodic flooding of major regional drainages, including the Whitewater River and Coachella Valley Stormwater Channel, results in the deposition of sand and gravel on the valley floor.

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.

A geotechnical investigation and infiltration testing was conducted for the Project site by Sladden Engineering in November 2019 (Appendix G). The investigation included soil borings and analysis, research into regional seismicity and associated hazards, and geotechnical recommendations for the proposed Project. The following summarizes the conditions found on the Project site. The findings and recommendations provided in the investigation are discussed in Section 2.9.6.

Subsurface Conditions

In November 2019, six exploratory boreholes to depths of approximately 15 to 51 feet below ground surface were drilled into the Project site. The boreholes' stratigraphy included a thin layer of artificial fill/disturbed soil generally less than approximately three feet in depth, and alluvium consisting primarily of silty sand (SM) with interbedded layers of sand (SP) below the fill/disturbed soil. The soils appeared grayish brown, dry to slightly moist, medium dense to dense, and fine-grained. One borehole included a clay layer.

Groundshaking

The Project site is located in a seismically active region where earthquakes originating on local and regional seismic faults can produce severe ground shaking. The San Andreas Fault is the closest fault in proximity to Indio and passes through the northeast portion of the City. The General Plan (Figure 10-1) indicates that the entire City, including the Project site, is potentially subject to moderate and high ground shaking risks.

Based on the probabilistic approach, the Project site could be subjected to ground motions on the order of 0.49g. The Peak Ground Acceleration (PGA) at the site is estimated to have a 475-year return period and a 10 percent chance of exceedance in 50 years.[10]

Static Settlement

The geotechnical investigation determined that static settlement resulting from the anticipated foundation loads associated with the proposed Project should be minimal provided that the recommendations included in the geotechnical report are considered in foundation design and construction. The estimated ultimate static settlement for the Project site is approximately 1 inch under the recommended bearing pressures.

Groundwater

During the borehole investigation, no groundwater was encountered to a maximum explored depth of approximately 51 feet below the ground surface. The Project geotechnical report concluded that groundwater should not be a factor during Project construction.

Liquefaction

Liquefaction can occur when loose, saturated granular soil loses strength as a result of cyclic loading. Generally, this phenomenon requires the presence of liquefaction-susceptible soil, groundwater within a depth of 50 feet or less, and strong seismic shaking. The Riverside County Land Information System identifies that the Project site is situated within a "Low to Moderate" liquefaction potential zone, and the Indio GPU EIR (Figure 4-6.4) indicates it has a very low liquefaction susceptibility. The site-specific geotechnical investigation evaluated groundwater maps of the Project vicinity and concluded that risks associated with liquefaction and liquefaction related hazards should be considered negligible.

Seismically Induced Slope Failures and Landslides

Strong groundshaking can result in unstable slope conditions, including rock falls and landslides. The ground surface of the Project site is relatively flat and not immediately adjacent to any slopes or hillsides. No signs of slope instability in the form of landslides, rock falls, earthflows or slumps were observed at or near the subject site. The Project geotechnical report concluded that risks associated with slope instability should be considered negligible.

Wind/Soil Erosion

The General Plan identified that the majority (around 60 percent) of the soils in the City consist of Gilman fine sandy loam, Indio very fine sandy loam, and Myoma fine sand, all of which have erosion potential. Natural erosion processes may be accelerated by human activities such as agriculture and development. Slopes created by cut and fill may be at greater risk of erosion than natural slopes, as grading and clearing activities eliminate protective vegetation, modify natural drainage patterns, and compress soils. The GPU EIR (Figure 4.6-5) shows that the Project site has a relatively low wind erosion susceptibility rating of Level 2 to 3 on a scale with a maximum rating of 8 (highest susceptibility). No signs of flooding or erosion were observed on the Project site during the geotechnical field investigation.

[10] Ibid (Appendix G).

Expansive Soils

Expansive soils have a tendency to increase volume with an increase in moisture content. They swell when water is added and shrink when they dry out, which can cause shifting and potential failure of a foundation or structure. The Project geotechnical investigation determined that near surface soils consist of silty sand (SM) and that surface materials have a very low expansion potential.

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 generally associated with the extraction and overdraft of groundwater. The U.S. Geological Survey (USGS) and Coachella Valley Water District (CVWD) investigated regional land subsidence and determined that, from 1993 to 2010, the land surface subsided about 220 to 600 mm (0.72 to 1.97 feet) in three areas of the Coachella Valley generally within Palm Desert, Indian Wells, and La Quinta.[11] The Project site is within the broad La Quinta subsidence area (see also Indio General Plan Figure 10-3). However, the Project-specific geotechnical field investigation found no fissures or other surficial evidence of subsidence onsite. The geotechnical report concluded that subsidence is a regional problem requiring broad-scale mitigation that is not specific to the Project vicinity. CVWD operates groundwater replenishment programs intended to contribute to the future stabilization of water levels and reductions in subsidence.

Paleontological Resources

Paleontological resources are the fossilized remains of prehistoric animals and plants, created more than 12,000 years ago in the Pleistocene era. Fossils are usually buried resources, and often cannot be identified on the surface. A relatively thick sequence (20,000 feet) of sediment has been deposited in the Coachella Valley portion of the Salton Trough from the Miocene era to present times. These sediments are predominately terrestrial in nature with some lacustrian (lake) and minor marine deposits. The major contributor of these sediments has been the Colorado River. The mountains surrounding the Coachella Valley are composed primarily of Precambrian metamorphic and Mesozoic granitic rock. According to the GPU EIR Sensitive Paleontological Resources Map (Figure 4.5-3), the majority of the City is in a high sensitivity area for paleontological resources. This is largely due to the presence of ancient Lake Cahuilla. The lakeshore and lakebed have yielded resources associated with the repeated stands of the ancient lake.

[11] "Land Subsidence, Groundwater Levels, and Geology in the Coachella Valley, California, 1993-2010," Scientific Investigations Report 2014-5075, US Geological Survey in cooperation with the Coachella Valley Water District, 2014.

In March 2020, a Project-specific paleontological resource assessment was prepared by Applied EarthWorks, Inc. to evaluate potential Project-related impacts on paleontological resources (Appendix J).[12] According to the literature review and museum records searches, the closest fossil presence is located approximately 5 miles southwest of the Project area and consists of many fully permineralized fossils from a Lake Cahuilla locality. These fossil resources have included various freshwater diatoms, land plants, sponges, ostracods, mollusks, fish, and small terrestrial vertebrates. The field survey found no paleontological resources on the Project site, other than sparse, partially fossilized freshwater gastropod shells in disturbed soils of the central Project site.

Although the Holocene-age alluvial deposits (Qa) mapped at the surface have a low likelihood of preserving significant paleontological resources, field observations and nearby fossil discoveries indicate that playa lake deposits may also be present at the ground surface (e.g., on the hill in the western portion of the Project area or in the outcrop near the southeast corner) or at very shallow depths as exposed by recent agricultural mixing throughout the Project area. Furthermore, deeper excavations in the Project area may encounter older alluvial deposits of Pliocene- to Pleistocene-age (Qoa, QTf), which may be present at unknown depths in the subsurface. Therefore, the entire Project area can have high potential for significant paleontological resources both near the ground surface and at greater depths, consistent with the sensitivity maps from the City of Indio and County of Riverside, which both indicate high potential in the Project area.

Based on information obtained from the desktop studies and field survey, Applied EarthWorks determined that the Project area has a high potential for significant paleontological resources, both near the ground surface and at greater depths.

2.9.6 Project Impacts

Would the Project:

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

ii) Strong seismic ground shaking?

General Plan Amendment

As stated in the General Plan Update EIR (page 4.6-13), seismic hazard risks in the City include strong ground shaking, which may result in moderate to heavy structure and infrastructure damage. However, all future development would be required to comply with applicable state laws and local regulations pertaining to seismic hazards, including the CBC, Earthquake Fault Zoning Act, and Chapter 162 of the City's Municipal Code (which outlines the grading

[12] "Paleontological Resources Assessment for the VENTANA Tentative Tract Map No. 37884 Project, City of Indio, Riverside County, California," prepared by Applied EarthWorks, Inc., March 2020 (Appendix J).

requirements for development activities in the City of Indio). Additionally, projects in areas with known geologic hazard conditions would be required to prepare a site-specific geotechnical investigation report (per GPU Policy SE-4.2) as well as adhere to other recommendations to minimize impacts associated with geologic hazards. As future projects are planned and developed, they will be required to adhere to the GPU policies and applicable state laws and local regulations; therefore, the GPU EIR concluded that potential seismic hazard impacts associated with development facilitated by the GPU would be less than significant.

The General Plan Amendment proposes a new designation, Transitional Neighborhood, for the Project site that would increase the allowable density on the Project site from 1 DU/AC to 3 DU/AC. At maximum buildout, the GPA would facilitate 91 more single-family dwelling units than buildout of the current General Plan land use designation (Desert Estates Neighborhood). Despite the increase in density, future projects on the site will still be subject to General Plan policies and existing regulations related to seismic hazards. Therefore, impacts associated with strong seismic ground shaking from the GPA would be consistent with those identified in the GPU EIR and would be less than significant.

VENTANA Specific Plan
Buildout of the proposed VENTANA Specific Plan would result in the development of 103 single-family dwelling units. All structures will be required to be constructed in accordance with the most recent edition of the California Building Code (CBC) and Indio Municipal Code Section 151.010 to provide collapse-resistant design. The Project site is classified as Site Class D in the Project geotechnical report based on a review of the location, and local soil and geologic conditions. Conformance with the Seismic Design Parameters under Category D will ensure that Project-related impacts associated with ground shaking are reduced to a less than significant level. With adherence to applicable seismic and other codes, the impacts of seismically induced ground shaking on the proposed buildings and structures will be less than significant.

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

General Plan Amendment
As stated in the GPU EIR (page 4.6-15), future development may result in soil erosion and/or loss of topsoil, as it would involve vegetation removal, grading, and potentially earth excavation, which would expose soils and increase the potential for soil erosion from wind or stormwater runoff. The GPU EIR Figure 4.6-5 identified that natural hazards related to wind erosion are present primarily in the northern and eastern portions of the Sphere of Influence, and that the erosion hazard at the Project site is relatively low (Level 2 to 3 on a scale where Level 8 is the highest susceptibility).

All future development would be required to comply with applicable state laws and local regulations pertaining to soil erosion, including the CBC, Chapters 152 and 155 of the City's Municipal Code that set forth requirements related to soil erosion and dust control, as well as Chapter 162 that establishes the grading requirements for development activities. Additionally,

projects in areas with known potential for soil erosion would be required to prepare a site-specific geotechnical investigation and soils report (per GPU Policy SE-4.2) as well as adhere to the grading and other recommendations to minimize impacts associated with erodible soils. Adherence to Policy CE-6.1 would ensure that grading impacts are minimized in order to limit soil erosion from wind, water and other geologic hazards. As future projects are planned and developed, they will be required to adhere to the GPU policies and applicable state laws and local regulations; therefore, the GPU EIR concluded that potential soil erosion impacts associated with GPU buildout would be less than significant.

The General Plan Amendment proposes a new land use designation, Transitional Neighborhood, for the Project site that would increase the allowable density on the Project site from 1 DU/AC to 3 DU/AC. Maximum buildout of the new land use designation would result in the development of 91 more single-family dwelling units than buildout of the current land use designation (Desert Estates Neighborhood). Despite the increased density, future projects on the site will still be subject to General Plan policies and existing regulations related to erosion control. Therefore, impacts associated with soil erosion from the GPA would be consistent with those identified in the GPU EIR and be less than significant.

VENTANA Specific Plan

Buildout of the VENTANA Specific Plan would result in the development of 103 single-family dwelling units on the Project site. As discussed above, the GPU EIR identifies the Project site as having relatively low wind erodibility. Construction of the Project may result in the short-term loss of topsoil due to runoff and wind erosion. However, the Project is subject to SCAQMD Rule 403.1 that requires a fugitive dust control plan. The Project will be required to adhere to erosion control measures imposed by the City of Indio through grading and building permit regulations, including measures to control fugitive dust and requirements to create a stable soil surface, free from blowing dust and sand during the duration of the grading work (Municipal Code Section 152.01). These requirements and measures will ensure that potential erosion is controlled during construction. At buildout, the Project area will consist of new structures, paved roads and parking areas, new landscaping and otherwise stabilized surfaces which will resist erosion. Compliance with regulatory requirements will ensure the impacts related to soil erosion or loss of topsoil are less than significant.

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?

General Plan Amendment

The GPU EIR identifies the Project site as having low to moderate liquefaction susceptibility. The Safety Element policies of the GPU (SE-4.1 through SE-4.7) would ensure that impacts related to geologic instability are taken into consideration and reduced or minimized in conjunction with future development. All future development would be required to comply with applicable state laws and local regulations pertaining to geologic instability, including the

CBC, Chapter 155 of the City's Municipal Code outlining the requirements related to geologic instability, and Chapter 162 of the City's Municipal Code outlining the grading and information requirements for development activities in the City. As future projects are planned and developed, they will be required to adhere to the GPU policies and applicable state laws and local regulations; therefore, the GPU EIR concluded that potential geologic instability impacts associated with the GPU would be less than significant.

While the General Plan Amendment proposes a new designation, Transitional Neighborhood, for the Project site and would increase the allowable density on the Project site from 1 DU/AC to 3 DU/AC, the new land use designation and future projects on the site will still be subject to General Plan policies and existing regulations as related to geologic and soil instability. Therefore, impacts associated with unstable geologic units or soil from the GPA would be consistent with those identified in the GPU EIR and remain less than significant.

VENTANA Specific Plan
The Project is not located within an area that is susceptible to landslides, liquefaction or liquefaction related hazards including lateral spreading. Surface soils of the proposed Project consist primarily of silty sand (SM), with some sand (SM and SP), clay (CH), and clayey silt (ML), which are not considered unstable.

The Project geotechnical report identified no fissures or other surficial evidence of subsidence in the project area during the field survey and literature review, and concluded that subsidence is considered a regional problem requiring regional mitigation not specific to the Project vicinity.

The Project proposes new homes 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 Project design and construction. These recommendations include remedial grading and conventional site preparation techniques such as over-excavation and re-compaction, as summarized in Section 2.9.7 below. The mitigation measures (GEO-1 through GEO-7) based on Project-specific recommendations will be integrated into grading and building plans that require approval by the City prior to issuance of grading and building permits, which will ensure that impacts associated with soils remain less than significant.

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

General Plan Amendment
According to the General Plan Update EIR (Figure 4.5-3), the majority of the city is identified as having High Potential for paleontological resources; therefore, future development associated with General Plan buildout could result in direct impacts to paleontological resources,

particularly if grading occurs in areas of high paleontological sensitivity, including undisturbed deposits of the Mecca Formation, Palm Spring Formation, Canebrake Conglomerate, Older Quaternary Lake Sediments, and Ocotillo Conglomerate. A mitigation measure (MM-CR-4) was developed in the GPU EIR requiring future development projects to conduct a paleontological field survey or field monitoring in areas of high sensitivity, as well as areas where no sensitivity mapping has occurred. Conservation Element policies of the GPU, including Policy CE-8.1: Site Plan Review and Policy CE-8.4: Monitoring, would also serve to ensure that impacts to paleontological resources are taken into consideration and reduced or minimized in conjunction with future development. Therefore, the GPU EIR concluded that potential impacts to paleontological resources under the GPU would be less than significant with adherence to GPU EIR mitigation measure MM-CR-4.

As stated above, the proposed General Plan Amendment would create a new land use designation (Transitional Neighborhood) and increase the allowable residential density on the Project site from 1 DU/AC to 3 DU/AC that, at maximum buildout, would accommodate 91 more dwelling units than the current land use designation (Desert Estates Neighborhood). Despite the increased density, the new designation and future projects on the site will still be subject to General Plan policies, MM-CR-4, and existing regulations related to paleontological resources. Therefore, impacts of the GPA on paleontological resources would be consistent with those identified in the GPU EIR and remain less than significant with mitigation required in the GPU EIR.

VENTANA Specific Plan

As described above, Applied EarthWorks, Inc. conducted a Paleontological Resource Assessment for the Project site in March 2020. Records identified no paleontological resources within one mile of the Project site. The research concluded that the Project would have the potential to significantly impact paleontological resources should excavation activity disturb deeper sediments dating to the earliest parts of the Holocene or Late Pleistocene periods.

Applied EarthWorks, Inc. also undertook a field survey on February 28, 2020 of the Project site. The field survey identified sparse, partially fossilized freshwater gastropod shells among the disturbed sediments in the central portion of the Project site.

Buildout of the proposed VENTANA Specific Plan will result in the development of 103 single-family dwelling units, roads, landscaped areas, and utilities on the Project site. During the construction phase, grading, excavation and other ground surface disturbances have the potential to unearth paleontological resources. To protect potential paleontological resources at the site, Applied EarthWorks, Inc. recommended Mitigation Measure GEO-8, which requires preparation of a paleontological resource mitigation program (PRIMP). Implementation of this mitigation measure will assure that Project-related impacts to paleontological resources are less than significant.

2.9.7 Mitigation Measures

The geotechnical report prepared for the Project site sets forth various design and remedial grading recommendations (including Mitigation Measures GEO-1 through GEO-7) to assure that the Project would be subject to or cause less than significant impacts regarding geotechnical conditions. The paleontological report recommends Mitigation Measure GEO-8. These measures shall be implemented to ensure less than significant impacts associated with geotechnical conditions and paleontological resources.

GEO-1 The Project structural engineer and contractor should follow the recommendations provided in the Project Geotechnical Investigation report prepared by Sladden Engineering on November 20, 2019 during Project design and construction, including:

GEO-2 Areas to be graded and paved should be cleared of any existing improvements, foundation elements, vegetation, root systems and debris. All areas scheduled to receive fill should be cleared of old fills and any irreducible matter. The strippings should be removed off site, or stockpiled for later use in landscape areas. Voids left by obstructions should be properly backfilled in accordance with the compaction recommendations of the geotechnical report.

GEO-3 Over-excavation and re-compaction should be conducted throughout the proposed building areas to achieve firm and uniform bearing conditions. All artificial fill soil and native low density near surface native soil should be removed to a depth of at least 3 feet below existing grade or 3 feet below the bottom of the footings, whichever is deeper. Remedial grading should extend laterally, a minimum of five feet beyond the footing limits. The soil exposed by over-excavation should then be scarified, moisture conditioned to near optimum moisture content and compacted to at least 90 percent relative compaction. The previously removed soil may then be replaced as engineered fill soil as recommended in Mitigation Measure GEO-4.

GEO-4 Compaction. Soil to be used as engineered fill should be free of organic material, debris, and other deleterious substances, and should not contain irreducible matter greater than three inches in maximum dimension. All fill materials should be placed in thin lifts, not exceeding six inches in a loose condition. If import fill is required, the material should be of a low to non-expansive nature and should meet the following criteria:

Plastic Index:	less than 12
Liquid Limit:	less than 35
Percent Soil Passing #200 Sieve:	between 15% and 35%
Maximum Aggregate Size:	3 inches

The subgrade and all fill should be compacted with acceptable compaction equipment, to at least 90 percent relative compaction. The bottom of the excavations should be observed by a representative of Sladden Engineering prior to fill placement. Compaction testing should be performed on all lifts in order to ensure proper placement of the fill materials. Excavation and compaction recommendations are summarized below.

- Remedial Grading: Removal and compaction of all artificial fill soil and loose native soil to depths of at least 3 feet below existing grade or 3 feet below the bottom of footings, whichever is deeper. Removals should extend laterally a minimum of 5 feet beyond the footing limits.
- Native/Import Engineered Fill: Place in thin lifts not exceeding 6 inches in a loose condition, compact to a minimum of 90 percent relative compaction within 2 percent of the optimum moisture content.
- Asphalt Concrete Sections: Compact the top 12 inches to at least 95 percent compaction within 2 percent of optimum moisture content.

GEO-5 Slabs-on-grade. Slab thickness, floor slab design and reinforcement should be determined by the Structural Engineer. A minimum slab thickness of 4.0 inches and minimum reinforcement of #3 bar at 24 inches on center shall be required in both directions. All slab reinforcement should be supported on concrete chairs to ensure that reinforcement is placed at slab mid-height.

GEO-6 Soil Corrosivity. Soluble sulfate content of the surface soil should be reevaluated after grading, and appropriate concrete mix designs should be established based upon post-grading test results. The site soil is considered to have a "moderate" corrosion potential with respect to ferrous metal installations. A corrosion expert should be consulted regarding appropriate corrosion protection measures for corrosion sensitive installations.

GEO-7 Drainage. All final grades should be provided with positive gradients away from foundations to provide rapid removal of surface water runoff to an adequate discharge point. No water should be allowed to pond on or be immediately adjacent to foundation elements. Subgrade drainage should be evaluated upon completion of the precise grading plans and in the field during grading.

GEO-8 Paleontological Resources. Prior to the issuance of grading permits, a paleontological resource mitigation program (PRIMP) shall be prepared by a qualified professional paleontologist to specify the steps to be taken to mitigate impacts to paleontological resources and indicate where and how often construction monitoring will be required for the Project.

- Worker's Environmental Awareness Program (WEAP) training shall be prepared prior to the start of Project-related ground disturbance and presented in-person to all field personnel to describe the types of fossils that may be found and the procedures to follow if any are encountered.

- The PRIMP shall indicate where construction monitoring is required and the frequency of monitoring. Based on the Project-specific paleontological study prepared by Applied Earthworks, Inc. in March 2020, an initial period of full-time construction monitoring at all depths throughout the Project area is recommended. Full-time monitoring may be reduced to spot-check monitoring at the discretion of the Project Paleontologist, if no intact and significant paleontological resources are encountered during the initial period of construction monitoring.
- The PRIMP also will provide details about fossil collection, analysis, and preparation for permanent curation at an approved repository.
- The PRIMP shall describe the different reporting standards to be used – monitoring with negative findings versus monitoring resulting in fossil discoveries.

2.9.8 Significance After Mitigation

The geotechnical and paleontological conditions in which the VENTANA Specific Plan Project will be constructed pose certain constraints, including seismic and soil conditions that require specific design and engineering solutions. With the application of the mitigation measures set forth above and in the geotechnical report, impacts will be mitigated to a less than significant level.

2.9.9 Cumulative Impacts

A consideration of cumulative effects associated with geotechnical conditions includes the degree to which a project may contribute to the cumulative impacts from seismic events, high groundwater, marginal soils, and other conditions. Most geology and soil hazards associated with development projects in the surrounding area would be site-specific.

The study area for the GPU EIR (page 5-12) assessment of cumulative impacts to geology and soils was the Coachella Valley. The EIR determined that potential impacts associated with future development facilitated by the GPU would be addressed through adherence to applicable building codes, GPU policies, and site-specific technical reports in areas with identified seismic hazards. Because geologic impacts are site-specific, they do not compound or increase in combination with other development projects in neighboring communities. Therefore, the General Plan would not result in cumulatively considerable impacts associated with geology and soils. Compared to the General Plan, maximum buildout of the proposed GPA and development of the proposed Project would result in a marginal increase in the total number of dwelling units, but both would result in the same ground surface disturbances as the current General Plan designation. As demonstrated in Section 2.9.7, above, impacts of the proposed GPA would be less than significant, and impacts of the VENTANA Specific Plan would be less than significant with mitigation. The Project, therefore, would not contribute considerably to cumulative impacts on geology and soils in the Coachella Valley.

2.10 Greenhouse Gas Emissions

2.10.1 Introduction

The following section describes the existing greenhouse gas emissions in the Coachella Valley, and analyzes the potential impacts associated with buildout of the proposed General Plan Amendment and VENTANA Specific Plan. A variety of local and regional data and information, ranging from research and analysis conducted for the planning area, to regional-scale planning and environmental documents, have been used in researching and analyzing the GPA, Specific Plan and its potential effects on greenhouse gases and climate change.

2.10.2 Thresholds of Significance

The project would have a significant effect on greenhouse gases if the Proposed Project were to:

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

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

2.10.3 Regulatory Framework

Federal and State

U.S. Environmental Protection Agency

The United States Environmental Protection Agency (USEPA) is responsible for implementing federal policy to address global climate change. The USEPA implements several voluntary programs that help to reduce GHG emissions that focus on energy efficiency, renewable energy, methane and other non-CO_2e gases, agricultural practices, and implementation of technologies to achieve GHG reductions. These voluntary programs include: State Climate and Energy Partner Network, which encourages the exchange of information between federal and state agencies regarding climate and energy; the Climate Leaders program for companies; the Energy Star® labeling system for energy-efficient products; and the Green Power Partnership for organizations interested in buying green power.

In 2009, the USEPA issued a Final Rule for mandatory monitoring and reporting of GHG emissions by fossil fuel suppliers, industrial gas suppliers, direct GHG emitters and manufacturers of heavy-duty and off-road vehicles and vehicle engines that emit 25,000 metric tons or more of carbon dioxide equivalent per year. Implementation of 40 CFR Part 98 is referred to as the Greenhouse Gas Reporting Program (GHGRP).

Especially relevant, the USEPA adopted a Final Endangerment Finding for the six defined GHGs. This Endangerment Finding is required for the USEPA to regulate GHG emissions under Section 202(a)(1) of the Clean Air Act (CAA). In 2010, the USEPA issued a Final Rule (GHG Tailoring Rule) that establishes a common-sense approach to addressing greenhouse gas emissions from stationary sources under CAA permitting programs, including the Prevention of Significant Deterioration (PSD) and title V Operating Permit Programs. The Tailoring Rule set initial emission thresholds– known as Steps 1 and 2 of the Tailoring Rule - for PSD and Title V permitting based on carbon dioxide equivalent (CO_2e) emissions.

In these phases, new construction projects and modifications of existing facilities that are 1) otherwise subject to PSD (for another regulated pollutant) and exceed a CO_2e threshold of 75,000 tons per year, or 2) exceed 100,000 tons per year and 100/250 tons per year on a mass basis (depending on the source category) are subject to permitting requirements. Additionally, operating facilities that emit at least 100,000 tons per year are subject to Title V permitting requirements for GHGs. New and existing industrial facilities that meet or exceed that threshold require a permit under the New Source Review Prevention of Significant Deterioration (PSD) and Title V Operating Permit programs. Step 3 of the GHG Tailoring Rule, issued on June 29, 2012, continued to focus GHG permitting on the largest emitters by retaining the permitting thresholds that were established in Steps 1 and 2. Step 3 revised the plantwide applicability limitations (PAL) regulations to allow a source that emits or has the potential to emit at least 100,000 tons per year of CO_2e, but that has minor source emissions of all other regulated NSR pollutants, to apply for a GHG PAL while still maintaining its minor source status[1].

Assembly Bill 1493 – The Pavley Bill

California was the first state to establish regulations that require the reduction of emissions of GHGs from motor vehicles. On September 24, 2004, the California legislature adopted the Pavley Bill that requires all motor vehicles of 2009 vintage or later to reduce their greenhouse gas emissions by about 30% by the year 2016. The second phase of the implementation for the Pavley bill was incorporated into Amendments to the Low-Emission Vehicle Program (LEV III) or the Advanced Clean Cars program. The Advanced Clean Car program combines the control of smog-causing pollutants and GHG emissions into a single coordinated package of requirements for model years 2017 through 2025. The regulation will reduce GHGs from new cars by 34% from 2016 levels by 2025.

Assembly Bill 32 - California Global Warming Solutions Act of 2006

On June 1, 2005 Governor Arnold Schwarzenegger issued executive order S-3-05, which calls for reduction in GHG emission to 1990 levels by 2020 and for an 80 percent reduction below 1990 levels by 2050. Also known as the California Global Warming Solutions Act of 2006 (AB 32) was adopted by the state legislature in 2006. It sets forth a program to achieve 1990 emission levels by 2020 and requires CARB to proclaim 1990 GHG emissions and develop a Scoping Plan, which

[1] "Clean Air Act Permitting for Greenhouse Gases," United States Environmental Protection Agency. Website. https://www.epa.gov/nsr/clean-air-act-permitting-greenhouse-gases. Accessed January 2021.

sets forth GHG reduction methods. CARB has reported that 1990 GHG emissions totaled 427 million metric tons (MMT) for the state of California. Accordingly, to satisfy the requirements of AB 32, California needs to reduce its overall 2020 emissions for all sectors by 169 $MMTCO_2e$, or 28.3 percent below the "business as usual" 2020 projection of 596 million $MMTCO_2e$

CARB adopted a GHG scoping plan on December 11, 2008. The Scoping Plan includes a cap and trade program, green building strategies, recycling and waste reduction, and Voluntary Early Actions and Reductions. This goal has been met.[2] In November 2017, CARB released the 2017 Climate Change Scoping Plan that not only discusses the interim 2030 targets, but how to substantially advance toward the State's 2050 climate goal to reduce GHG emissions by 80 percent below 1990 levels (see Senate Bill 32 below).

Senate Bill 375

California SB 375 was signed by the Governor in September 2008 and is intended to at least in part implement greenhouse gas reduction targets set forth in AB 32 by setting regional "caps" on the GHGs emitted by the transportation sector. The bill encourages regional land use planning to reduce vehicle miles traveled and requires Metropolitan Planning Organizations (MPO) to adopt a sustainable communities strategy as part of their Regional Transportation Plans. The applicable MPO for the Coachella Valley is the Southern California Association of Governments ("SCAG"), which adopted the 2020-2045 Regional Transportation Plan and Sustainable Communities Strategy in September of 2020. SCAG's current target is to reduce GHG emissions from automobiles and light duty trucks by 8 percent per capita by 2020 and 19 percent by 2035 from 2005 emissions levels.

Senate Bill 32

In support of the GHG reduction targets established by AB 32, Executive Order B-30-15 was issued by Governor Brown on April 29, 2015 establishing an interim statewide goal to reduce greenhouse gas emissions to 40% below 1990 levels by 2030 ensuring the state will continue its efforts to reduce carbon pollution. Most recently, this 40% target was codified through Senate Bill 32 (2016), which adds section 38566 to the Health and Safety Code and requires that CARB ensure statewide GHG emissions meet the 40% reduction target no later than Dec. 31, 2030.

Green Building Code

In January 2010, the State of California adopted the California Green Building Standards Code (CALGreen) per CCR Title 24, Part 11, which establishes mandatory green building standards for all buildings in California. The code covers five categories: planning and design, energy efficiency, water efficiency and conservation, material conservation and resource efficiency, and indoor environmental quality. These standards include a mandatory set of minimum guidelines, as well as more rigorous voluntary measures, for new construction projects to achieve specific green building performance levels. The City has adopted the California Building Code, 2019 Edition.

[2] Based upon the 2019 GHG inventory data (i.e., the latest year for which data are available) for the 2000-2017 GHG emissions period, California emitted an average 424.1 $MMTCO_2e$.

Regional and Local

Indio Climate Action Plan

The City of Indio adopted its Climate Action Plan (CAP) in September 2019 in an effort to address climate change at the local level by reducing greenhouse gas emissions within its own operations and the overall community. The CAP provides a framework for the development and implementation of policies and programs that will reduce the City's emissions and is tracked via the City's Communitywide and Municipal Greenhouse Gas Inventories. (See Section 2.10.5 for current City reduction targets).

Indio General Plan

The Indio General Plan includes the following goals and policies that pertain either directly or indirectly to climate change and greenhouse gas emissions:

Goal SE-2 **Emergency Preparedness.** Provide City leadership within the region by promoting a collaborative environment that sustains maximum resilience to emergencies and disasters.

Policy SE-2.3 **Climate Change**. When updating hazard mitigation and emergency management plans, incorporate climate change hazards, vulnerabilities, and risks into the analysis.

Goal SE-5 **Community Resilience.** A community that is prepared for the potential impacts of climate change.

Policy SE-5.1 **Regional Partnerships**. Establish partnerships with State, Federal, regional, and local agencies to collaborate and better understand the regional impacts of climate change, and to develop multijurisdictional solutions.

Policy SE-5.2 **Climate change research**. Integrate climate change research and adaptation planning into City operations, services, and public infrastructure development, including capital improvements.

LU-2.1 **Walkable neighborhoods.** Require all new neighborhoods to be pedestrian friendly by including features, such as short blocks, wide sidewalks, shaded streets, buildings that define and are oriented to streets or public spaces, traffic-calming features, convenient pedestrian street crossings, and safe streets designed for pedestrians, cyclists, and vehicles.

LU-4.6 **Climate-appropriate design.** Encourage the use of building techniques and materials that relate to Indio's warm and dry desert climate. Promote solar control and use of shade in building design and associated pedestrian amenities.

LU-5.8 **Connective corridors.** Ensure high-quality, people-oriented street design and urban design occurs where highlighted by the Connective Corridors in Figure 3-8 of the GPU.

LU-6.11 **Circulation connectivity.** Seek opportunities to enhance and maintain existing residential neighborhoods by improving pedestrian and bicycle facilities, installing traffic calming measures, and "punch through" cul-de-sacs.

LU-7.11 **Connections to key destinations.** Require direct pedestrian and bicycle connections between residential areas and nearby commercial and public and institutional areas as well as other residential areas.

LU-10.4 **Non-polluting industries.** Promote development of non-polluting industries that are not major sources of air and water pollution or other negative externalities.

ME-2.1 **CV Link.** Support and complement implementation of the CV Link project by providing connections from CV Link to activity centers of the City and assisting in the thoughtful implementation of the facility. This includes CV Link connectivity, including CV Link spur routes and the North Spur Bike Path.

ME-2.2 **Facility enhancement**. Enhance the bicycle and pedestrian facilities as identified in Figure 4-1 as part of development, private grants, signing of shared routes, maintenance activities, etc. The City will also complete and continually update a Complete Streets Master Plan which will also assist in enhancing bicycle and pedestrian infrastructure.

ME-2.3 **Safe Routes to School.** Encourage the use of bicycles and walking as the preferred transportation mode for trips to and from elementary, middle, and high schools. Continue implementation of the City's Safe Routes to School Plan.

ME-2.4 **Intersection and signal enhancements.** Enhance pedestrian and bicycle crossing efficiency and safety, including timing of signals, crosswalks, and intersection design features.

ME-4.3 **Regional coordination.** Coordinate with Caltrans, CVAG, SCAG, and adjacent agencies to implement complete streets and maintain consistency with regional plans such as the Regional Transportation Plan and Sustainable Communities Strategy and Congestion Management Program

2.10.4 Environmental Setting

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

Certain gases in the earth's atmosphere, classified as greenhouse gases (GHGs), play a critical role in determining the earth's surface temperature. These gases allow solar radiation into the earth's atmosphere, but prevent radioactive heat from escaping, thus warming the earth's atmosphere. The principal GHGs contributing to the greenhouse effect are CO_2, methane (CH_4), nitrous oxide (N_2O), and fluorinated compounds (hydrofluorocarbons, perfluorocarbons and sulfur hexafluoride). GHG sources include both natural and anthropogenic processes, and some are associated with air pollution. The quantity of greenhouse gases in the atmosphere has increased significantly over a relatively short period, which is believed to cause the global average increase in surface temperatures of 0.7-1.5 °F that were observed during the 20th century.

California is the second largest greenhouse gas contributor in the U.S. and the fifteenth largest in the world.[3] In 2004, California produced 492 million metric tons of CO_2 equivalent ($MMTCO_2e$), which was approximately 7% of all U.S. emissions. However, in 2018, California's total emissions were 425 $MMTCO_2e$, representing an overall decrease of 13.6% since peak levels in 2004.[4] This puts total emissions below the 2020 target of 431 million metric tons.

During the 2000 to 2018 period, per capita GHG emissions in California continued to drop from a peak in 2001 of 14.0 tons per person to 10.7 tons per person in 2018, a 24% decrease. This decrease may be due to the increased use of renewable energy, including solar generation, hydropower, and wind energy and increases in the effectiveness of energy conservation in buildings (Title 24 requirements).

The transportation sector remains the largest source of GHG emissions in the state, accounting for 40% of California's emissions in 2018. Regulations, improved fuel efficiency of the state's vehicle fleet, and higher market penetration of zero-emission vehicles will drive down emissions over time, but population growth, lower fuel prices, improved economic conditions and higher employment rates are potential factors that may increase fuel use.[5]

[3] Each Country's Share of CO_2 Emissions, updated Aug 12, 2020. https://www.ucsusa.org/resources/each-countrys-share-co2-emissions

[4] "California Greenhouse Gas Emission Inventory for 2000 to 2018," California Air Resources Board, 2020.

[5] Ibid.

2.10.5 Existing Conditions

The City of Indio has developed a Climate Action Plan (CAP) that sets forth a series of strategies to achieve greenhouse gas reduction targets. According to the City's CAP, Indio's 2010 communitywide emissions baseline is 607,946 metric tons of CO2e ($MTCO_2e$), which is equivalent to 8 $MTCO_2e$ per capita.

In order to comply with SB 32, the City's General Plan would need to achieve 10.6 $MTCO_2e$ per capita and 7.4 $MTCO_2e$ per service population. At the time of the GPU EIR, the projected population of Indio in 2040 was 119,951 persons and the projected employment was 25,085 jobs. Thus, Indio's service population is anticipated to be 145,036 residents and workers in 2040 (119,951 + 25,085 = 145,036). After adjusting for reduction measures set forth in the CAP, future development consistent with the General Plan would result in communitywide emissions of 528,051 MTCO2e in 2020, and 387,122 $MTCO_2e$ in 2030, which represents an emission level of approximately 6.5 $MTCO_2e$ per capita in 2020, and 3.9 $MTCO_2e$ per capita in 2030. Therefore, the General Plan would achieve per capita target for the years 2020 and 2030, as established by SB 32.

2.10.6 Project Impacts

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

Greenhouse gas emission were modeled for three buildout scenarios: maximum potential buildout of the site under the existing land use designation (max 45 single-family dwelling units), maximum potential buildout of the site under the proposed GPA land use designation (136 single-family/condo dwelling units), and buildout of the VENTANA Specific Plan (103 single-family dwelling units).

Construction and operational GHG emissions were calculated using California Emissions Estimator Model (CalEEMod) version 2016.3.2. The model calculates criteria pollutant emissions as well as greenhouse gases in carbon dioxide equivalent (CO_2e). CalEEMod output tables are provided in Appendix B of this EIR.

General Plan Amendment

The General Plan Update (GPU) EIR assessed GHG emissions based on adopted GHG reduction goals, specifically statewide targets established by SB 375, AB 32, and SB 32. The City's Climate Action Plan (CAP) uses the per capita and per service population[6] approach to identify a communitywide emissions target that equates to 10.6 $MTCO_2e$ per capita and 7.4 $MTCO_2e$ per service population. The EIR determined that the General Plan would achieve an emission level of 6.5 $MTCO_2e$ per capita and 5.0 $MTCO_2e$ per service population in 2020, which exceeds both

[6] Service population is defined as the number of residents plus employees for a given project.

reduction targets identified in the CAP, resulting in a less than significant impacts on the environment. Based on these findings, future development consistent with the General Plan is considered to have less than significant GHG emission-related impacts on the environment.

The GPA proposes to increase the 45-acre site's density from 1 DU/AC to 0-3 DU/AC, which will increase potential buildout of the site by 91 single-family residential units and therefore has the potential to increase the GHG emissions previously analyzed in the GPU EIR. To determine if the potential increase in GHG emissions is significant, CalEEMod was used to calculate emissions associated with maximum potential buildout of the site under the existing land use designation and the proposed GPA land use designation.

Construction

Construction activities will result in short-term GHG emissions associated with operation of construction equipment, employee commute, material hauling, and other ground disturbing activities. GHG emissions were calculated in CalEEMod using the following assumptions:

Existing LU Assumptions

- 45.17 acres site
- Max 45 single family residential units
- 1.5-year construction schedule starting mid-2021
- Preliminary grading plans estimate a net material export of 74,383 CY
- Assumed same daily trip rate for single-family residential land uses cited in the Project-specific Traffic Report (Kunzman Associates 2021)
- Applicant approved default construction equipment list (CalEEMod) for site preparation, grading, building construction, paving, and architectural coating.

Proposed GPA Assumptions

- 45.17 acres site
- Max 136 single-family residential units
- 2.5-year construction schedule (due to increased site density) starting mid-2021
- Preliminary grading plans estimate a net material export of 74,383 CY
- Assumes 1,284 daily trips per the Project-specific Traffic Report (Kunzman Associates 2021)
- Applicant approved default construction equipment list (CalEEMod) for site preparation, grading, building construction, paving, and architectural coating.

Buildout of the site under the existing land use designation would generate 1,192 $MTCO_2e$ over the 1.5-year construction period, and buildout of site under the proposed GPA land use designation would generate 1,800 $MTCO_2e$ over the 2.5-year construction period. There are currently no construction related GHG emission thresholds for projects of this nature. To determine if construction emissions will result in a cumulative considerable impact, buildout GHG emissions were amortized over a 30-year period and added to annual operational emissions to be compared to applicable GHG thresholds (see Table 2.10-1, below).

Operation

At buildout, there are five emission source categories that will be contributing either directly or indirectly to operational GHG emissions, including energy/electricity usage, water usage, solid waste disposal, area emissions (pavement and architectural coating off-gassing), and mobile sources. Table 2.10-1 provides a summary of the projected short-term construction and annual operational GHG generation associated with both buildout scenarios.

Table 2.10-1
Operational and Amortized Construction GHG Emissions: GPA
(Metric Tons/Year)

Existing Conditions	**$MTCO_2e$**
Area Emissions	1.5
Energy Emissions	300.5
Mobile Emissions	563.0
Waste Emissions	30.0
Water Emissions	38.0
Amortized Construction Emissions	40.0
Total	**973**
GPA Buildout	
Area Emissions	4.5
Energy Emissions	908.0
Mobile Emissions	1,670.5
Waste Emissions	90.5
Water Emissions	114.5
Amortized Construction Emissions	60.0
Total	**2,848**

Source: CalEEMod Version 2016.3.2. See Appendix B for detailed output tables. Numbers have been rounded up to the nearest half number.

Based on Indio's average household size of 3.31 persons and 136 potential single-family residences, buildout of the GPA could result in an increased population of 451 residents, resulting in a per-capita emission rate of 6.3 $MTCO_2e$ per person. Compared to buildout of the site under existing conditions (3.32 persons and 45 potential single-family residences equates to 6.53 $MTCO_2e$ per capita), the GPA would reduce per capita emissions by 0.23 $MTCO_2e$ per person, therefore having a net positive impact towards the City's GHG per capita reduction goals. The reduction in per capita GHG emissions as a result of the GPA is consistent with both the City's communitywide per capita target of 10.6 $MTCO_2e$ and the General Plan's 6.5 $MTCO_2e$ per capita level analyzed in the GPU EIR. Impacts from climate change would be further reduced through adherence to state, regional, and federal regulations of GHG emissions, including the General Plan policies described in Section 2.10.3 above. Future development of the site would be subject project-level review, and components of construction and operation,

including equipment, fuels, materials, and management practices, would be subject to current SCAQMD rules and regulations related to greenhouse gases. Therefore, impacts would be less than significant.

VENTANA Specific Plan

The City requires that individual development projects undergo project-specific environmental review and apply mitigation measures as necessary to reduce any significant impacts. The Project will result in development of the proposed VENTANA Specific Plan and is therefore subject to project-level CEQA review. As mentioned above, the California Emissions Estimator Model (CalEEMod) Version 2016.3.2 was used to quantify air quality emission projections for Project construction and operations, including greenhouse gas emissions (Appendix B).

Construction

Construction activities will result in short-term GHG emissions associated with operation of construction equipment, employee commute, material hauling, and other ground disturbing activities. The following Project-level information was modeled in CalEEMod:

- 45.17 acres site, 103 single-family residential units
- For analysis purposes, it was assumed that buildout of the Specific Plan would occur over a 2-year period, starting in mid-2021 and ending in mid-2023
- Preliminary grading plans estimate a net material export of 74,383 CY
- 972 daily traffic trips per the Project-specific Traffic Report (Kunzman Associates 2021)
- Applicant approved default construction equipment list (CalEEMod) for site preparation, grading, building construction, paving, and architectural coating.

Based on the above Project information, buildout of the Specific Plan will generate 1,447 $MTCO_2e$ during the 2-year construction period. There are currently no construction-related GHG emission thresholds for projects of this nature. To determine if construction emissions will result in a cumulative considerable impact, buildout GHG emissions were amortized over a 30-year period and added to annual operational emissions to be compared to applicable GHG thresholds (see Table 2.10-2, below).

Operation

A significant effect on the environment is defined as a "substantial, or potentially substantial, adverse change to the environment" (California Public Resources Code Section 21068). On December 5, 2008, the SCAQMD formally adopted a greenhouse gas significance threshold of 10,000 MTCO2e/year that only applies to stationary sources (industrial uses) where SCAQMD is the lead agency (SCAQMD Resolution No. 08-35). This threshold was adopted based upon an October 2008 staff report and draft interim guidance document[7] that also recommended a threshold for all projects using a tiered approach.

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

It was recommended by SCAQMD staff that a project's greenhouse gas emissions would be considered significant if it could not comply with at least one of the following "tiered" tests:

- **Tier 1**: Is there an applicable exemption?
- **Tier 2**: Is the project compliant with a greenhouse gas reduction plan that is, at a minimum, consistent with the goals of AB 32/SB 32?
- **Tier 3**: Is the project below an absolute threshold (10,000 MTCO2e/yr for industrial, projects and 3,000 MTCO2e/yr for non-industrial projects)? A project's construction emissions are averaged over 30 years and are added to the project's operational emissions.
- **Tier 4**: Is the project below a (yet to be set) performance threshold?
- **Tier 5**: Would the project achieve a screening level with off-site mitigation?

The VENTANA Specific Plan proposes a residential development, which is comparable to the Tier 3 non-industrial threshold of 3,000 MTCO2e/yr.

At buildout, there are five emission source categories that will be contributing either directly or indirectly to operational GHG emissions, including energy/electricity usage, water usage, solid waste disposal, area emissions (pavement and architectural coating off-gassing), and mobile sources. Table 2.10-2 provides a summary of the projected short-term construction and annual operational GHG generation associated with buildout of the Project.

Table 2.10-2
Operational and Amortized Construction GHG Emissions:
VENTANA Specific Plan
(Metric Tons/Year)

VENTANA Specific Plan	(Metric Tons/Year)
Area Emissions	3.5
Energy Emissions	688.0
Mobile Emissions	1,289.0
Waste Emissions	69.0
Water Emissions	87.0
Amortized Construction Emissions	48.5
Total	**2,185**
Source: CalEEMod Version 2016.3.2. See Appendix B for detailed output tables. Numbers have been rounded up to the nearest half number.	

As shown in the table above, the proposed Project will generate 2,185 MTCO2e/yr and therefore complies with SCAQMD Tier 3 threshold. All components of construction and operation, including equipment, fuels, materials, and management practices, would be subject to GPU policies and current SCAQMD rules and regulations related to greenhouse gases.

Applicable SCAQMD rules include, but are not limited to, source-specific standards that reduce the greenhouse gas content in engines and limit equipment idling durations. The Project will also adhere to the state required Low Carbon Fuel Standard for construction equipment and heavy-duty vehicle efficiency standards.

Based on these findings, GHG emissions resulting from buildout of the Project are considered less than significant and mitigation measures are not required.

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

General Plan Amendment

The GPU EIR determined development projects consistent with the General Plan were considered to have less than significant impacts on the environment. As previously discussed under response a), above, the site's maximum buildout potential under the proposed GPA land use designation will result in emissions that are consistent with the communitywide per capita emissions threshold set forth in the General Plan and Climate Action Plan, as established by SB 32.

The City's CAP and GPU goals and policies support transportation and energy GHG emission reduction measures consistent with the CARB 2017 Climate Change Scoping Plan. Additionally, the GPU would support implementation of SCAG's 2016 RTP/SCS by proposing more compact, transit-friendly land use patterns. All components of future construction and operation, including equipment, fuels, materials, and management practices, would be subject to the CAP, GPU policies, and current SCAQMD rules and regulations related to greenhouse gases, as discussed above. Overall, impacts are expected to be comparable if not less than those identified in the EIR due to the reduction in per capita emissions that help the City to achieve statewide per capita reduction goals established by SB 32. Therefore, implementation of the GPA will not conflict with an applicable GHG reduction plan, policy, or regulation, and impacts will be less than significant.

VENTANA Specific Plan

As previously discussed under response a), above, buildout of the proposed VENTANA Specific Plan is consistent with the SCAQMD Tier 3 test and will not generate significant GHG emissions. Based on Indio's average household size of 3.31 persons, the VENTANA Specific Plan could result in an increase of 341 residents, resulting in a per-capita emission rate of 6.4 $MTCO_2e$ per person. Compared to buildout of the site under existing conditions, the VENTANA Specific Plan would reduce per capita emissions by 0.13 $MTCO_2e$ per person, therefore having a net positive impact towards the City's GHG reduction goals.

As with buildout of the GPA, the Specific Plan will result in emissions that are consistent with the communitywide per capita emissions threshold set forth in the General Plan and Climate Action Plan, as established by SB 32. The City's CAP and GPU support and are consistent with the CARB 2017 Climate Change Scoping Plan and SCAG's 2016 RTP/SCS. All components of

construction and operation, including equipment, fuels, materials, and management practices, would be subject to the CAP, GPU policies, and current SCAQMD rules and regulations related to greenhouse gases, as discussed above. Based on these findings, the VENTANA Specific Plan will not conflict with an applicable plan, policy or regulation with the purpose of reducing GHG emissions and impacts will be less than significant.

2.10.7 Mitigation Measures

Impacts will be less than significant, and no mitigation measures required.

2.10.8 Significance After Mitigation

Impacts remain less than significant without mitigation measures.

2.10.9 Cumulative Impacts

Using the summary of projections method to analyze cumulative impacts set forth in State CEQA Guidelines Section 15130 (b)(1)(B), impacts have been assessed on a regional scale. The study area for the GPU EIR (page 5-12) assessment of cumulative GHG emissions was the boundary of the traffic study area, which includes the Planning Area and extends to areas outside the City, such as roads that are shared by other communities in the neighboring cities of La Quinta, Coachella, Palm Desert, and the County of Riverside. The primary documents used to determine cumulative impacts were the CAP, 2017 CARB Scoping Plan and SCAG's 2016 RTP/SCS, which were designed for the long-term regulation of GHG emissions in the region and State.

The GPU EIR determined that future development consistent with the GPU would also be consistent with the City's and State's GHG reduction goals. The City's CAP and GPU goals and policies support transportation and energy GHG emission reduction measures consistent with the CARB 2017 Climate Change Scoping Plan. Additionally, the GPU would support implementation of SCAG's 2016 RTP/SCS by proposing more compact, transit-friendly land use patterns. Because the GPU would not result in exceedances of goals and standards set by SB 32 and the 2017 Scoping Plan, impact would not be cumulatively considerable.

Although the proposed Specific Plan and GPA will result in a net increase in total annual GHG emissions compared to existing conditions, per capita emission rates were reduced under both scenarios when compared to existing conditions and are therefore consistent with the per capita emission thresholds set forth in the General Plan and CAP, as established by SB 32. Development of the site will adhere to the City's CAP and GPU goals and policies that support GHG emission reduction measures and impacts to climate change are expected to be less than significant. Based on the findings herein, the proposed GPA and VENTANA Specific Plan will not result in GHG emission impacts that are cumulatively considerable or significant.

2.11 Hazards and Hazardous Materials

2.11.1 Introduction

This section describes hazardous materials and other hazards to public health and safety that could result from the proposed Project. Potential construction and operational impacts related to hazards and hazardous materials are analyzed, and mitigation measures are proposed, as appropriate. This analysis also evaluates potential impacts from regional hazards, including public and private airports and wildfire hazards. Geotechnical hazards are discussed separately in Section 2.9 of this EIR.

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

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

2.11.2 Thresholds of Significance

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

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

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

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

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

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

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

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

The Initial Study determined that the Project would result in "No Impact" for threshold questions c) through g), above. Therefore, they are not analyzed further in this EIR.

2.11.3 Regulatory Framework

Federal

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

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

State

California Occupational Safety and Health Act – California Labor Code, Section 6300

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

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

California Health and Safety Code, Title 22, Chapter 20 Hazardous Waste Permit Program

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

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

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

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

License to Transport Hazardous Materials – California Vehicle Code, Section 32000.5 et seq.
Caltrans regulates hazardous materials transportation on all interstate roads. Within California, the State agencies with primary responsibility for enforcing federal and State regulations and for responding to transportation emergencies are the California Highway Patrol (CHP) and Caltrans. Together, federal and State agencies determine driver training requirements, load labeling procedures, and container specifications for vehicles transporting hazardous materials.

Regional/Local

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

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

HWMP policies require the County to coordinate its efforts with state and federal agencies in the identification and establishment of programs for managing these wastes. Using the County identified hazards, other cities in the County can utilize the information to prepare their own hazard mitigation plans, in conjunction with the County.

City of Indio General Plan
The City's General Plan Update includes policies in the Health and Equity, Infrastructure and Public Facilities, and Safety Elements that address issues related to the transport, use, disposal, and accidental release of hazardous materials and health hazards from hazardous materials. They ensure potential impacts in conjunction with future development are reduced or minimized. The following policies are relevant to the proposed Project:

Health and Equity Element

Policy HE-3.3 Construction Pollution. Reduce particulate emissions from paved and unpaved roads, construction activities, and agricultural operations.

Policy HE-3.4 Sensitive Receptor Uses. Discourage development of sensitive land uses – defined as schools, hospitals, residences, and elder and childcare facilities – near air pollution sources that pose health risks – including freeways and polluting industrial sites.

Policy HE-3.5 Truck Routes. Designate truck routes to avoid sensitive land uses, where feasible.

Policy HE-3.7 Public Education. Provide educational information about air quality issues and their health effects, including best practices for reducing and/or eliminating sources of indoor air pollution.

Policy HE-3.8 Sensitive Receptors and Agricultural Operations. When new sensitive receptors are proposed adjacent to existing active agricultural operations, ensure that an appropriate buffer is provided to minimize adverse impacts and that future residents will be provided with a notice specifying the potential nuisances, such as dirt, noise, odors, and slow moving agricultural machinery that would be associated with the agricultural operations.

Infrastructure and Public Facilities Element

Policy IE-1.3 NPDES compliance. Ensure project developer compliance with the National Pollution Discharge Elimination System (NPDES) MS4 permit requirements.

Policy IE-6.3 Educate the Public. Provide information to the public on composting, recycling, and "green purchasing," which refers to buying environmentally-friendly products and services that utilize fewer resources, are designed to last longer, and minimize impacts to the environment from production to disposal.

Safety Element

Policy SE-7.1 Enforcement Actions. Require all users, generators and transporters of hazardous materials and wastes to identify the materials they store, use or transport, in accordance with disclosure laws, to have adequate spill clean-up kits while transporting, and to have a clean-up response plan with contact phone numbers.

Policy SE-7.2 Hazardous Materials Transport Routes. Require submittal of a transportation of hazardous materials plan to address possible impacted facilities along these routes and identify emergency response actions that can be implemented in case of an accident. Limit transportation routes to areas away from critical facilities and infrastructure and not over bridges if possible.

Policy SE-7.3 Hazardous Materials Siting. Prohibit the placement of proposed new facilities that will be involved in the production, use, storage, transport or disposal of hazardous materials near existing land uses that may be adversely affected by such activities. Conversely, prohibit the development of new sensitive facilities (like schools, child-care centers, nursing homes, senior housing, etc.) near existing sites that use, store or generate hazardous materials.

Policy SE-7.6 Hazardous Mitigation Training. Establish clear policies and protocol for action in the event of a hazardous contamination. Recommend and offer trainings to private sector companies.

2.11.4 Environmental Setting

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

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

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1 California Department of Toxic Substances Control Website, https://www.dtsc.ca.gov/Title22/, accessed January 2021.

2 United States Environmental Protection Agency Website - Resource Conservation and Recovery Act (RCRA) and Federal Facilities, https://www.epa.gov/enforcement/resource-conservation-and-recovery-act-rcra-and-federal-facilities, accessed January 2021.

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

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

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

Historically, the City was one of the larger farming communities in the Coachella Valley. Today, agricultural areas are mostly located north of I-10 and south of Avenue 50.[5] Lands used for agriculture result in a potential for soil contamination from prior use of herbicides, fertilizers and pesticides. A potential health hazard can arise when residential neighborhoods located next to agricultural lands are subjected to overspray of agricultural chemicals.

2.11.5 Existing Conditions

The Project site is located in the City of Indio where hazardous materials transport, storage, and use is strictly regulated for large quantity users, such as industrial processing plants and commercial dry cleaners. The City implements regular consultation with the State Water Resource Control Board (SWRCB) and Regional Water Quality Control Board (RWQCB). The City also monitors and regulates industrial plants and commercial areas through its Municipal Code.

[3] United States Environmental Protection Agency Website - Categories of Hazardous Waste Generators, https://www.epa.gov/hwgenerators/categories-hazardous-waste-generators, accessed January 2021.

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

[5] Draft EIR for the City of Indio 2040 General Plan Update (March 2019 Version) – Page 4.8-4.

Areas with Potential Hazardous Materials Contamination

SWRCB maintains an online database (GeoTracker) which includes information on hazardous waste sites and their location and status. Currently, the GeoTracker database includes 136 sites within the City that are either listed or permitted as hazardous material sites under the California Department of Toxic Substances Control (DTSC).[6] No hazardous material site is recorded at the Project site. Within one mile of the Project site, there is one Leaking Underground Storage Tank (LUST) cleanup site, the Citrus Course Club House; this case was closed as of 1995. Another cleanup site within one mile of the Project site is the Southwest Indio Elementary School; this case is inactive and was withdrawn as of 2006.

Agricultural Use of the Project Site

The Project site is currently vacant but was previously in agricultural use between around 1953 and 2016. Because of the agricultural history of the property, there is a potential that pesticides have been applied at some point in the past. Some pesticides, particularly arsenic-based compounds and chlorinated hydrocarbons can remain in the soil for decades after they were applied. Pesticides which are present in concentrations considered non-hazardous in an agricultural setting can sometimes exceed recommended guidelines for a residential setting. There have been no documented releases of these substances at the site.

Phase I Environmental Site Assessment

On October 14, 2019, a Phase I Initial Site Environmental Assessment (Phase I) was conducted by Sladden Engineering in conjunction with the proposed Project to identify any potentially hazardous substances onsite or in the Project vicinity that could impact or be impacted by the Project (see Appendix E). The methods and procedures used included a field visit, review of site maps and photos, and review of regulatory and agency databases. An Environmental Database Report (EDR), generated from a search of federal, state, and local government records, identified multiple sites of environmental concern within approximately one mile of the Project site, including the LUST and school site described above. However, the report determined that none of the sites pose a significant environmental impact on the Project site. The Project site itself was not listed in any database.

Aerial photos and maps showed the site was vacant and undeveloped from 1949 to 1953, then used for agricultural purposes until the 1980s, and again from 2000 to 2019. Items observed onsite during site reconnaissance included insecticide/herbicide containers, old tires, irrigation standpipes and driplines, and scattered buckets/containers and concrete debris. An interview with a Kraemer Land Company representative indicated previous use of agricultural chemicals and past presence of chemical storage tanks onsite, though the details are unknown. Because there are no landfills, dumps, buried organic debris and no underground petroleum storage tanks onsite, the Phase I study determined that the potential for methane or other subsurface gases impacting the subject site is negligible.

[6] GeoTracker Online Database List, https://geotracker.waterboards.ca.gov/map/?CMD=runreport&myaddress=rancho+mirage+, accessed January 2021.

The Phase I identified no documented releases of pesticides at the site, but recommended a limited Phase II investigation consisting of surface soil sampling and analytical testing to evaluate the potential presence of residual pesticides, herbicides, and fertilizers associated with previous agricultural activities.[7]

Soil Sampling and Analysis

Per the recommendations of the Phase I study described above, shallow soil sampling at the Project site and subsequent lab analysis were conducted by Sladden Engineering in November 2019 (see Appendix E).[8] Soil samples were collected at depths between 6 and 12 inches below the ground surface throughout the site. The samples were analyzed for organochlorine pesticides such as arsenic and Dichlorodiphenyldichloroethylene (4,4-DDE). Based on the laboratory results, no arsenic was detected above the indicated reporting limit in any samples tested. DDE was detected in samples at concentrations between "not detected" and 33 µg/kg, which are well below the California Human Health Screening Levels (CHHSL) of 1.6 mg/kg for a residential setting. No other organochlorine pesticides were detected at concentrations above their laboratory detection limit. Additional environmental investigations relating to the Phase I report were deemed unnecessary. The investigation concluded that there is no evidence of persistent pesticides on the subject property in concentrations which could present any health or safety concern for future residents of the subject property. Therefore, impacts to residents from previous use of the property for agricultural purposes will be less than significant.

2.11.6 Project Impacts

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.

General Plan Amendment

According to the General Plan Update EIR (Page 4.8-16), health hazards from hazardous materials in the City are primarily associated with agricultural byproducts and older structures. The GPU EIR stated that all future development projects in the City would be required to comply with applicable federal and state laws and local regulations pertaining to hazardous materials, such as California Hazardous Waste Control Law, California HSC, California Fire Code, California Department of Public Health, the City's Code of Ordinances, SCAQMD and RCRA regulations, and GPU policies. Implementation of specific policies including HE-3.8 (see Section

[7] "Results of Phase I Environmental Site Assessment Proposed Residential Development Avenue 50 East of Jefferson Street Indio, California", prepared by Sladden Engineering, October 2019.

[8] "Results of Shallow Soil Sampling Proposed Residential Development APNs 602-070-004, 602-080-001 & 602-080-002 Avenue 50 East of Jefferson Street Indio, California", prepared by Sladden Engineering, November 2019.

2.11.3, above) would work to reduce contamination from agricultural uses. The GPU EIR concluded that potential health hazard impacts associated with the GPU would be less than significant.

All future development under the General Plan Update would be required to comply with applicable federal and state laws and local regulations pertaining to the transport, use, disposal, and accidental release of hazardous materials, including but not limited to CERCLA, RCRA, Title 22 of the California Public Health and Safety Code, the Uniform Fire Code, and Section 70.120 of the City's Municipal Code (which restricts vehicles transporting hazardous materials to I-10 within the City limits). Adherence to GPU policies listed above in Section 2.11.3, specifically Policies HE-3.5 and SE-7.2, would ensure that all hazardous materials transported through the City are restricted to designated routes and avoid sensitive land uses. The GPU EIR stated that as future projects are planned and developed, they must adhere to the GPU policies and applicable federal and state laws and local regulations; therefore, potential hazardous materials impacts associated with the GPU would be less than significant.

The proposed GPA would change the land use designation of the Project site to a new designation, Transitional Neighborhood (0-3 DU/AC), which would allow an additional 91 residential units to be developed compared to the current designation. Transitional Neighborhood is considered a bridge between the low-density and high-density residential designations in the General Plan. The GPA would not change the residential nature of the future onsite development; future development would consist of low-density single-family dwelling units consistent with the type of development currently allowed. The Project site and any associated development would still be subject to all applicable General Plan policies as the current residential designation. Therefore, the GPA would not cause any new potentially significant impacts regarding hazards and hazardous materials. Impacts would be less than significant and consistent with those of the General Plan analyzed under the GPU EIR.

VENTANA Specific Plan

The construction phase of the proposed Specific Plan would involve the use of heavy equipment, which uses limited quantities of oil and fuels and other potentially flammable substances. During construction, equipment could require refueling and minor maintenance on site that could lead to fuel and oil spills. However, the Project contractor will be required to identify a staging area for storing equipment and materials and will be subject to laws and regulations regarding the handling, storage, and use of hazardous materials during construction.

Long-term operation of the proposed Project includes development of residential units and landscaped areas which would involve use of limited quantities of chemicals typical of a low-density residential neighborhood, such as cleaning and degreasing solvents, fertilizers, pesticides, pool chemicals, and similar materials. These chemicals will be transported to and stored in individual homes within the Project site. They will occur in limited quantities and will not require a hazardous material handling/storage permit. Residents will be responsible for the

appropriate disposal of hazardous materials used in their homes, such as paint, batteries, and oils. None of these chemicals will be used in sufficient quantities so as to pose a threat to humans or cause a foreseeable chemical release into the environment. As discussed in Section 2.12.6 of this DEIR, the Project will be required to implement Best Management Practices (BMPs) through the preparation and approval of a Water Quality Management Plan (WQMP) and Stormwater Pollution Prevention Program (SWPPP), both of which are requirements for the City's NPDES implementation. The Project will include an infiltration basin with high removal efficiency for pollutants of concern such as heavy metals, pathogens and toxic organic compounds. Implementation of BMPs including the infiltration basin will reduce pollutants of concern that may enter receiving retention basins and affect water quality.

The proposed Project would not result in a significant risk of explosion or accidental release of hazardous substances, because the cleaners and household chemicals used are not explosive and will not be stored in large quantities. The use and handling of hazardous materials during construction activities and long-term operation of the proposed Project would occur in accordance with applicable federal, state, and local laws, including California Occupational Health and Safety Administration (CalOSHA) requirements. Impacts would be less than significant.

2.11.7 Mitigation Measures

Impacts will be less than significant, and no mitigation measures are required.

2.11.8 Significance After Mitigation

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

2.11.9 Cumulative Impacts

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

The GPU EIR stated that future impacts would be avoided through compliance with federal, state, and local regulations, along with applicable General Plan policies. The General Plan's incremental contribution to hazardous materials impacts would not be cumulatively considerable.

When considered in conjunction with other related development projects in the area, the proposed Project will result in an incremental increase in the quantities of hazardous materials transported to, used, and stored in the local area. However, Project-related impacts will be less than significant due to the limited quantities that would be present, the nature of substances to be used, and adherence to laws and regulations that minimize foreseeable upset and accident conditions. The same is true of future development in the area surrounding the Project site, which is generally designated for residential development. Cumulative use of residential cleaning products and similar materials will not result in a cumulatively significant impact on the environment.

2.12 Hydrology and Water Quality

2.12.1 Introduction

This section describes existing hydrological conditions, including groundwater, surface water, water quality, stormwater, and flooding conditions within the Project area and evaluates potential impacts to hydrology and water quality that could result from implementation of the Project. The analysis in this section is based on the review of existing resources, applicable laws and regulations, and the Preliminary Drainage Report[1] (Appendix H) prepared for the proposed Project.

2.12.2 Thresholds of Significance

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

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

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

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

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

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

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

   iv) impede or redirect flood flows.

[1] Preliminary Drainage Report For Tentative Tract Map No. 37884, City of Indio, County of Riverside, prepared by MDS Consulting, March 2020.

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

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

The Initial Study determined that the Project would result in "No Impact" for threshold question d) above. Therefore, it is not analyzed further in this EIR.

2.12.3 Regulatory Framework

Federal

Clean Water Act (CWA)

The federal Clean Water Act, enacted by Congress in 1972, as amended, is the primary federal law regulating water quality in the United States and forms the basis for several state and local laws and regulations throughout the country. The CWA establishes the basic structure for regulating discharges of pollutants into the waters of the United States. The CWA gives the U.S. Environmental Protection Agency (USEPA) the authority to implement federal pollution control programs, such as setting water quality standards for contaminants in surface water, establishing wastewater and effluent discharge limits for various industry contaminants in surface water, establishing wastewater and effluent discharge limits for various industry categories, and imposing requirements for controlling nonpoint-source pollution. At the federal level, the Clean Water Act is administered by the USEPA and U.S. Army Corps of Engineers (ACOE). At the state and regional levels in California, the act is administered and enforced by the State Water Resources Control Board (SWRCB) and the nine Regional Water Quality Control Boards (RWQCB). The Coachella Valley is within the Colorado River Basin RWQCB (Region 7).

The federal CWA prohibits discharges of stormwater from construction projects unless the discharge is in compliance with an NPDES permit. The SWRCB is the water discharge permitting authority in California, and adopted an NPDES General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities (Construction General Permit) (Order No. 2009-0009, as amended by Order No. 2010-0014). The Order applies to construction sites that include one or more acre of soil disturbance. Construction activities include clearing, grading, grubbing, excavation, stockpiling, and reconstruction of existing facilities involving removal or replacement. When applicable, the Construction General Permit requires that the landowner and/or contractor file permit registration documents prior to commencing construction and then pay a fee annually through the duration of construction. These documents include a notice of intent, risk assessment, site map, stormwater pollution prevention plan (SWPPP), and signed certification statement. The SWPPP must include measures to ensure that: all pollutants and their sources are controlled; non-stormwater discharges are identified and eliminated, controlled, or treated; site Best Management

Practices (BMPs) are effective and result in the reduction or elimination of pollutants in stormwater discharges and authorized non-stormwater discharges; and BMPs installed to reduce or eliminate pollutants after construction are completed and maintained. The Construction General Permit specifies minimum BMP requirements for stormwater control based on the risk level of the site. The Permit also specifies minimum qualifications for a qualified SWPPP developer and qualified SWPPP practitioner.

National Pollutant Discharge Elimination System (NPDES) Regulations

In 1987, amendments to the Clean Water Act added Section 402, which established a framework to protect water quality by regulating industrial, municipal, and construction-related sources of pollutant discharges to waters. In California, the NPDES program is administered by the SWRCB through the RWQCBs and requires municipalities to obtain permits that outline programs and activities to control wastewater and stormwater pollution. The NPDES program provides two levels of control for the protection of water quality: technology-based limits and water quality-based limits. Technology-based limits are based on the ability of dischargers to treat the water, while water quality-based limits are required if technology-based limits are not sufficient to protect the water body. The water quality-based effluent limitations required to meet water quality criteria in the receiving water are based on the National Toxics Rule, the California Toxics Rule, and the Basin Plan (see below under Porter-Cologne Water Quality Control Act).

State

Porter-Cologne Water Quality Control Act

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

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

Senate Bill 610

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

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

The water supply assessment must be approved by the public water system at a regular or special meeting and must be incorporated into the CEQA document. The lead agency must then make certain findings related to water supply based on the water supply assessment. The proposed Project will result in fewer than 500 dwelling units, and thus does not meet the thresholds requiring a Water Supply Assessment per Senate Bill 610.

Senate Bill 221

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

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

California Code of Regulations

Title 24, Part 5 of the California Code of Regulations (CCR), establishes the California Plumbing Code, which was last updated in 2019 and became effective January 1, 2020. The California Plumbing Code sets forth efficiency standards (i.e., maximum flow rates) for new plumbing fittings and fixtures, including showerheads and lavatory faucets. Section 1605.3(h) establishes State efficiency standards for non-federally regulated plumbing fittings, including commercial pre-rinse spray valves.[2]

Regional/Local

Colorado River Basin Regional Water Quality Control Board

The SWRCB carries out its water quality protection authority through the adoption of Basin Plans. These plans establish water quality standards for particular bodies of water. California water quality standards are composed of three parts: the designation of beneficial uses of water, water quality objectives to protect those uses, and implementation programs designed to achieve and maintain compliance with water quality objectives. The RWQCB, Colorado River Basin Region, is responsible for the Basin Plan. The RWQCB implements management plans to modify and adopt standards under provisions set forth in Section 303(c) of the CWQ and the California Water Code (Division 7, Section 13240).

The SWRCB adopted the Policy for Implementation of Toxics Standards for Inland Surface Waters, Enclosed Bays, and Estuaries of California in 2000. This policy provides implementation measures for criteria contained in the California Toxics Rule, promulgated in May 2000 by USEPA. When combined with the beneficial use designations in the Basin Plan, these documents establish statewide water quality standards for toxic constituents in surface water.

Colorado River Basin Plan

The Basin Plan for the Colorado River Basin (RWQCD Region 7), amended in March 2014, establishes water quality objectives for constituents that could potentially cause an adverse effect or impact on the beneficial uses of water. Specifically, Basin Plans are designed to accomplish the following:

1. Designate beneficial uses for surface and ground waters.

[2] 2019 California Plumbing Code, California Code of Regulations, Title 24, Part 5. Effective January 1, 2020.

2. Set the narrative and numerical objectives that must be attained or maintained to protect the designated beneficial uses and conform to California's anti-degradation policy.

3. Describe implementation programs to protect the beneficial uses of all water in the region.

4. Describe surveillance and monitoring activities to evaluate the effectiveness of the Basin Plans.

Basin Plans incorporate by reference all applicable SWRCB and RWQCB plans and policies. In addition to Basin Plan requirements, the RWQCB has water quality control authority under Section 401 of the CWA if a city were to apply for a nationwide Permit under Section 404 of the CWA.

Total Maximum Daily Load

Total Maximum Daily Load (TMDL) refers to the amount of a specific pollutant a river, stream, or lake can assimilate and still meet federal water quality standards as provided in the CWA. TMDL accounts for all sources of pollution, including point sources, non-point sources, and natural background sources. Section 303(d) requires that regulatory agencies determine TMDLs for all water bodies that do not meet water quality standards. The Section 303(d) list of impaired water bodies provides a prioritization and schedule for development of TMDLS for the state. The SWRCB, in compliance with the Section 303(d) of the CWA (33 U.S. Code [USC] Section 1313[d], prepared, and USEPA approved, a 2010 list of impaired water bodies in California. The list includes a priority schedule for the development of TMDLs for each contaminant or "stressor" impacting the water body. The Proposed Project area is adjacent to the Whitewater Floodplain, Tahquitz Channel, Cathedral Canyon Channels East and West, and Whitewater River Channel/Coachella Valley Stormwater Channel.

<u>Riverside County NPDES Permit</u>

Riverside County has been issued NPDES Permit No. CAS617002 for stormwater runoff by the Colorado River Region RWQCB. Riverside County and the Riverside County Flood Control and Water Conservation District (RCFCWCD) are principal permittees, and the CVWD and 10 cities are listed as co-permittees, including the City of Indio.

<u>City of Indio Ordinance No. 1684</u>

The City of Indio/Indio Water Authority mandates efficiency in newly installed landscape irrigation systems via Ordinance No. 1684 (Water Efficient Landscape Development Standards). The ordinance is adopted in substantially the same form as the CVAG/CVWD's regional water efficient landscape ordinance, which is significantly more stringent than the State model ordinance. This ordinance establishes effective water-efficient landscape requirements for newly installed and renovated landscapes. The ordinance also implements the requirements of the State of California Water Conservation in Landscaping Act. Most cities in the Coachella Valley have adopted the CVWD ordinance or a version thereof such as this ordinance; some have adopted more stringent or completely different ordinances.

City of Indio Municipal Code

Indio Municipal Code Sections 54.050 through 54.063 are dedicated to water conservation. Specifically, Section 54.062, Landscape and Water Conservation, establishes landscaping equipment requirements for all development. Section 54.063 sets specific standards to minimize wasteful water use in landscaping.

Chapter 55 of the Municipal Code regulates non-storm water discharges to the municipal storm drain to control and reduce pollutants entering the City's water bodies and groundwater consistent with the federal Clean Water Act and Porter-Cologne Water Quality Control Act. All discharges must comply with a National Pollution Discharge Elimination System Permit and/or City municipal codes if they are more stringent. The provisions of this chapter specifically address construction activity, new development or redevelopment projects, outdoor storage areas, and commercial and industrial facilities.

Chapter 153 of the Municipal Code establishes floodplain management regulations that are designed to protect public safety and minimize flood damage. Methods of reducing flood losses include restricting or prohibiting uses that increase water or erosion hazards, require that uses vulnerable to floods be protected from flood damage at the time of construction, control the alteration of natural floodplains and channels, control development activities that increase flood damage, and regulate the construction of flood barriers.

City of Indio General Plan

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

Conservation Element

Policy CE-2.3 New development requirements. Require new development projects to implement water conservation measures that are equivalent to or exceed CalGreen Tier One or other applicable standards in effect at the time of development.

Policy CE-2.4 Drought-tolerant landscaping. Exceed State landscaping water efficiency standards by requiring the use of drought tolerant landscaping, minimizing the use of turf, and encouraging the retrofitting of existing irrigation systems

Policy CE-2.5 Water-efficient landscaping and appliances. Encourage the retrofitting of existing water intensive appliances and irrigation systems. Continue to disseminate information about the CVWD and IWA rebate programs.

Infrastructure and Public Facilities Element

Policy IE-1.3 NPDES Compliance. Ensure project developer compliance with the National Pollution Discharge Elimination System (NPDES) MS4 permit requirements.

Policy IE-2.4 Multiple Use. Promote multiple use of flood control facilities where feasible, combining for example retention basins and recreational facilities.

Policy IE-2.6 Stormwater Facility Design. Design storm drain facilities to allow for infiltration, evapotranspiration, or reuse of stormwater or runoff on the site where it is generated to the extent practical.

Policy IE-2.9 State and Federal Guideline. Construct and maintain storm drains and flood control facilities in accordance with local, State, and federal guidelines.

Safety Element

Policy SE-6.3 Hydrological Studies in New Development. Require new development proposals to include as a condition of approval, hydrological studies prepared by a state-certified engineer with expertise in these kinds of studies, that assess the impact the new development will have on the flooding potential of existing development down-gradient. The studies shall provide mitigation measures to reduce this impact to an acceptable level.

2.12.4 Environmental Setting

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

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

2.12.5 Existing Conditions

<u>Regional Surface Water Hydrology</u>

The Project site is located at the southwesterly boundary of the Colorado River Hydrologic Region (HR) in the Whitewater River Hydrologic Unit (HU) and falls under the jurisdiction of the Colorado River Regional Water Quality Control Board (Region 7). Within the Whitewater River

Hydrologic Unit, the Project site lies in the Indio hydrologic subarea of the Coachella Hydrologic Area. The Indio hydrologic subarea contains sparsely populated mountains, desert, and agricultural lands. Urbanized areas are principally located on the Coachella Valley floor between Banning and Indio along Interstate 10, and from Palm Springs to Coachella along Highway 111.

In the Coachella Valley, the Whitewater River and its easterly extension, the Coachella Valley Stormwater Channel (CVSC), is the principal drainage course; it is typically dry, but flows southeasterly when it carries water. The Whitewater River has a total drainage area of approximately 850 square miles and drains areas as far away as the summit of Mount San Gorgonio and the steep southern and eastern slopes of the Little San Bernardino Mountains. In the City of Indio, the local storm drain system consists of gutters, engineered storm drains, and channels which generally convey runoff from local streets and lots to regional facilities, including the CVSC and the Salton Sea.

Project Site Hydrology

The Project site is currently vacant and undeveloped, but the ground surface was previously disturbed as the site was used for agricultural cultivation until around 2016. The site is relatively flat with a manufactured hill near the northwestern corner. It contains no rivers or streams and currently drains from north to south at a slope of 0.3%. There is no existing storm drain system nearby.

MDS Consulting prepared a Preliminary Drainage Report for the proposed Project in March 2020[3] (Appendix H) that included a soil resource report. Onsite soils consist of: 1) Gilman fine sandy loam (0 to 2 percent slopes) (GbA) covering ±30% of the site in the southern and central portions and the northeasterly corner, 2) Indio fine sandy loam (Ip) covering ±10% of the site along the southwestern boundary, and 3) Myoma fine sand (0 to 5 percent slopes) (MaB) covering ±60% of the site in the northern and eastern portions.

In October 2019, onsite infiltration testing was performed to evaluate the infiltration potential of near surface soils.[4] Testing was conducted at depths of approximately 3½ to 4 feet below the existing ground surface at three locations where future retention basins are proposed (Retention Basins CC in the central portion of the site, BB in the southeasterly corner, and EE near Avenue 50). Infiltration rates at the three locations were 15.6, 15.6, and 10.4 inches per hour, respectively.

Water Resources

The City currently has five sources of water: groundwater from the Whitewater River Basin; Colorado River water; State Water Project water; recycled water; and surface water. Groundwater has been the principal source of urban water supply in the Coachella Valley since

[3] Preliminary Drainage Report For Tentative Tract Map No. 37884, City of Indio, County of Riverside, prepared by MDS Consulting, March 2020.

[4] Infiltration Testing for Onsite Storm Water Retention, Proposed Residential Development, Avenue 50 East of Jefferson Street, Indio, California, Sladden Engineering, November 8, 2019.

the early part of the twentieth century. Groundwater also supplies water for crop irrigation, fish farms, duck clubs, golf courses, greenhouses, and industrial uses in the valley. The Indio Water Authority (IWA) provides potable water to a majority of the City; the remainder is served by the Coachella Valley Water District (CVWD).

The Whitewater River Basin underlies the valley and generally extends from the Whitewater River in the northwest to the Salton Sea in the southeast. The aquifer is naturally subdivided by fault barriers into subbasins, which are further divided into subareas. 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. Water supplies for the City of Indio are primarily from the lower aquifer in the Lower Whitewater River Subbasin. Because the Whitewater River Basin is an un-adjudicated basin, IWA and CVWD do not hold specific water rights, but rather pump supplies from the aquifer as needed to meet demand within their service areas. IWA currently has 20 operational supply wells. Pumping capacities for these wells range from 1,200 gpm to 3,500 gpm, with a total pumping capacity of 74,600 acre-feet per year (AFY).[5] Its average baseline water demand in 2015 was 18,208 AFY. CVWD has approximately 96 groundwater production wells and delivered approximately 92,974 acre-feet of potable water in 2015.[6]

Water Quality

The City, including the Project site, is located within the Coachella Valley where the water quality is generally good to excellent. While the use of septic systems in Indio and elsewhere in the valley historically has impacted water resources, nitrate levels in Indio meet or exceed current standards, and water quality in the City has not been impacted by septic systems.[7]

IWA conducts water quality monitoring in accordance with federal and state drinking water requirements and analyzes water samples for regulated and unregulated substances. Based on the most current water quality report (IWA 2019), drinking water delivered from IWA's potable water system supplied from groundwater wells complies with all state and federal drinking water quality regulations.[8] The principal concern affecting IWA's water quality has been Chromium-6, a naturally occurring mineral in parts of the Coachella Valley Groundwater Basin. Prior to 2016, several wells did not meet the state's new Chromium-6 standard and were taken out of service. However, other wells were not affected and remained active with sufficient capacity.[9] IWA has invested in water quality projects since 2015, including the relining of two large reservoirs, Chromium-6 treatment systems, and other infrastructure upgrades to ensure consistent delivery and production of safe drinking water.

5 2015 Urban Water Management Plan Final Report, prepared for Indio Water Authority, July 1, 2016.
6 2015 Urban Water Management Plan Final Report, prepared for Coachella Valley Water District, July 1, 2016.
7 2015 Urban Water Management Plan Final Report, prepared for Indio Water Authority, July 1, 2016.
8 Indio Water Authority Annual Water Quality Report – 2019 Results.
9 2015 Urban Water Management Plan Final Report, prepared for Indio Water Authority, July 1, 2016.

2.12.6 Project Impacts

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

General Plan Amendment

The proposed General Plan Amendment would change the land use designation on the Project site from Desert Estates Neighborhood (up to 1 du/ac) to Transitional Neighborhood (0-3 du/ac), thereby increasing the development potential on the subject property from a maximum buildout of 45 dwelling units to 136 dwelling units, an increase of 91 units. It would also revise the General Plan land use map and text accordingly. Amendments would apply only to the subject property. The GPA does not propose new or revised goals, policies, or programs pertaining to water quality and would have no impact on existing General Plan goals, policies, or programs as described below.

The GPU EIR (page 4.9-17) determined that the General Plan Update would facilitate growth and development that would increase runoff pollutants and contaminants that could be discharged into local and regional waters. However, the General Plan Infrastructure and Public Facilities Element includes policies to ensure that water quality protection measures are implemented and impacts to water quality are reduced or minimized in conjunction with future development through NPDES compliance (Policy IE-1.3), promoting public awareness (Policy IE-1.4 & 1.6), and reducing agricultural contamination (Policy IE-1.5). The GPU EIR concluded that impacts to water quality would be less than significant with adherence to General Plan policies, Municipal Code requirements, and existing development and water quality control regulations, including the NPDES General Construction permit.

Compared to the current General Plan land use designation, the proposed General Plan Amendment would increase the allowable residential density on the Project site. The additional 91 dwelling units represent a marginal increase of 0.2% more than the number of units projected at GPU buildout (38,144). The GPA would be expected to proportionally increase the quantity of pollutants generated onsite; however, consistent with the 0.2% increase in units, impacts associated with water quality discharge would be marginal. The GPA would result in the same type of low-density, single-family residential development current allowed, and therefore the same types of household pollutants (i.e., pesticides, fertilizers, trash and debris) and vehicle pollutants (i.e., oils and grease) would be generated. The GPA would increase the amount of impervious surfaces, including rooftops, streets and sidewalks that would convey pollutants into drainage systems and groundwater basins. However, under the GPA, future projects on the site would still be subject to General Plan policies, Municipal Code requirements, and existing regulations related to water quality control. With implementation of these standard measures, any project built based on the GPA would not violate any water quality standards or waste discharge requirements. Therefore, impacts on water quality from the GPA would be consistent with those identified in the GPU EIR and be less than significant.

VENTANA Specific Plan

The proposed Project site is located in the Whitewater River watershed which drains into the Salton Sea and is part of the larger Colorado River Watershed. All water providers in the watershed, including IWA, are required to comply with State Regional Water Resources Control Board (SWRCB) standards for the protection of water quality.

Construction

Construction of the proposed Project would entail grading and other earth-moving activities that could erode and deposit sediments, vegetation and other debris into local drainage systems. Additionally, chemicals, oils, grease, and fuels from vehicles and heavy equipment could be released into drainage systems and impact water quality.

The Project is required to comply with a number of regulations designed to reduce or eliminate construction-related water quality effects, including the NPDES General Construction Activity Stormwater Permit, which regulates stormwater discharges to surface waters. Under NPDES regulations, the proposed Project applicant is responsible for preparing a Storm Water Pollution Prevention Plan (SWPPP) to mitigate the effects of erosion and the inherent potential for sedimentation and other pollutants entering the stormwater system. The SWPPP must include erosion and sediment control Best Management Practices (BMPs) that would meet or exceed measures required by the determined risk level of the Construction General Permit. A construction site monitoring program that identifies monitoring and sampling requirements during construction is a required component of the SWPPP. In addition, the Project would be subject to Municipal Code Chapter 55 which establishes stormwater management and discharge controls and requires the application of BMPs. A Preliminary Water Quality Management Plan (WQMP) was prepared for the proposed Project which includes BMPs specific to the Project. The WQMP will be approved by the City prior to issuance of grading permits, and the BMPs included in that approved document will be implemented on the site.

Operation

The proposed Project provides for on-site stormwater management, treatment and storage. The site will be graded to direct drainage as surface flow into the proposed private streets where proposed curb inlet catch basins will capture and convey stormwater to six onsite retention basins. The proposed retention basins have been designed to retain 100 percent of stormwater flows from a 100-year storm event per City requirements.

Rainfall data for the 100 year 1-, 3- , 6-, and 24-hour storms were input into the synthetic unit hydrograph spreadsheet per the Riverside County Flood Control and Water Conservation District's (RCFC&WCD) Hydrology Manual. Peak flows were calculated using the RCFC&WCD Rational Method Calculation for sizing the retention basins. Combined, the retention basins have been designed to contain approximately 10.39 acre feet of stormwater runoff, which will adequately contain 100 percent of stormwater flows from a 100-year storm event, with freeboard (see Appendix H, Preliminary Drainage Report, for detailed calculations).

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

Summary

The proposed retention basins have been designed to retain 100 percent of stormwater flows from a 100-year storm event per City requirements. The Project has been designed to comply with NPDES regulations and the BMPs set forth in the Project-specific WQMP, which minimize the pollutant load associated with urban runoff during construction and operation. Best management practices include, but are not limited to, incorporating landscaping into the drainage design, designing retention basins that act as a natural filtration system, and maximizing canopy interception and water conservation by planting native trees and shrubs.

A final hydrologic analysis will be required to demonstrate that the Project meets the City's standards. Adherence to 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 implementation of BMPs described in the Project-specific WQMP will ensure that Project will not violate any water quality standards or waste discharge requirements, or otherwise degrade water quality. Impacts would be less than significant.

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

General Plan Amendment

As noted, the proposed General Plan Amendment would create a new land use designation (Transitional Neighborhood, max 3 du/ac) and apply it to the Project site, thereby increasing the development potential on the subject property from a maximum buildout of 45 dwelling units to 136 dwelling units, an increase of 91 units. It would also revise the General Plan land use map and text accordingly. The GPA does not propose new or revised goals, policies, or programs pertaining to water supply and would have no impact on existing General Plan goals, policies, or programs.

The GPU EIR (page 4.9-18) stated that future development facilitated by the GPU would increase the demand for groundwater supplies and decrease infiltration of water into groundwater basins, thereby reducing groundwater recharge. However, all future developers would be required to comply with applicable state and local regulations that concern groundwater recharge, including Chapter 55 of the Municipal Code which requires new development and redevelopment projects to use porous materials and create permeable areas

to ensure soil infiltration and to use project design features that direct runoff to permeable areas. They also must adhere to the General Plan policies and regulations and federal, state, and local requirements. The GPU EIR concluded that potential impacts to groundwater recharge associated with growth accommodated by the GPU would be less than significant. The new land use designation created by the GPA will be subject to the same General Plan policies and existing regulations.

To provide a conservative analysis, it is assumed that maximum buildout of the proposed General Plan Amendment occurs and all additional 91 dwelling units are built. As shown in Table 2.12-1, full buildout has the potential to generate an additional demand of approximately 14.07 acre-feet per year, which represents less than 0.08% of IWA's 2015 baseline demand (18,208 AFY). The GPA would result in a marginal increase in water demand compared to the current Desert Estates Neighborhood designation (1 DU/AC) on which, in part, the IWA based its UWMP future water demand analysis. Future projects under the GPA would still be required to install stormwater retention basins and/or other permeable features in their designs such that groundwater recharge is not compromised. Therefore, impacts of the GPA on groundwater supplies and recharge are expected to be largely consistent with those identified in the GPU EIR and less than significant with implementation of General Plan policies and other regulations.

Table 2.12-1
Additional Water Demand at the General Plan Amendment Buildout

Proposed Land Use	Units Allowed	Water Consumption Factor	Water Demand (gpd)	Total Water Demand At buildout (AFY)
Single-Family Residential	91 DU	138 gallons per unit per day	12,558	14.07

VENTANA Specific Plan

The proposed Project will require water for domestic use and landscape irrigation. The Water Research Foundation (WRF) has developed demand factors for land use categories, including residential and landscaping uses.[10] According to the Project water budget, the public landscaped area totals 311,485 square feet, yielding an estimated water demand of 17.07 acre-feet per year. As shown in Table 2.12-2, buildout of the proposed Project has the potential to generate a demand of 32.99 acre-feet per year. This represents 0.18% of IWA's 2015 baseline demand (18,208 AFY) and a marginal increase in local water demand. The Specific Plan includes landscaping guidelines that promote drought tolerant plantings and materials that can be expected to further reduce water consumption.

[10] Residential End Uses of Water, Version 2 Executive Report, Water Research Foundation, April 2016.

Table 2.12-2
Water Demand at the Project Buildout

Proposed Land Use	Max/Min Allowed	Water Consumption Factor	Water Demand (gpd)	Total Water Demand At buildout (AFY)
Single-Family Residential	103 DU	138 gallons per unit per day	14,214	15.92
Landscaping	311,485 sq.ft.	varies by vegetation type	15,238	17.07
			TOTAL	**32.99**

As noted in Section 2.12.5, the City of Indio's largest water supply source is groundwater from the Whitewater River Basin which has approximately 28.8 million acre-feet of water in storage. IWA works with CVWD to manage the underground water basins and better serve the City. IWA and CVWD have access to or are working to obtain other water supply sources to meet projected water needs and help eliminate groundwater overdraft. The proposed Project represents a marginal increase in density (2.3 DU/AC) compared to the current designation (1 DU/AC) on which, in part, the IWA based its UWMP future water demand analysis. The Project includes six (6) retention basins with a combined capacity of 10.39 acre-feet that will facilitate percolation of runoff into the groundwater basin. The Project would not interfere with sustainable groundwater management programs. Therefore, Project impacts on water supplies and groundwater recharge will be less than significant.

The Project will be required to comply with existing General Plan policies, requirements of the Municipal Code and other regulations, and the IWA's water-efficiency requirements, including the use of drought-tolerant planting materials and limited landscaping irrigation. Implementation of these and other applicable requirements will assure that groundwater-related impacts are less than significant level.

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

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

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

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

iv) impede or redirect flood flows?

General Plan Amendment

Development facilitated by the General Plan would allow for grading and construction in previously undeveloped areas, which may alter drainage patterns and/or result in an increase in impervious surfaces, thereby potentially increasing stormwater runoff. Increased stormwater runoff would have the potential to result in erosion or siltation, or exceed the capacity of the storm drain system and result in flood hazards on surrounding lands. The Project site is not located in or adjacent to a 100-year or 500-year floodplain designated by FEMA.

The General Plan Conservation, Infrastructure and Public Facilities, and Safety Elements include goals, policies, and programs to ensure that future development is reviewed for potential risks from altered drainage patterns, stormwater runoff, and stormwater management and design, and that impacts relative to flooding are taken into consideration and reduced or minimized to the fullest extent feasible in conjunction with future development. The General Plan policies require that future development be consistent with existing topography and drainage patterns, and ensure that new systems are properly designed to address stormwater drainage in conjunction with new development.

As stated in the GPU EIR, future development projects are required to comply with applicable laws and regulations that concern stormwater runoff and the protection of drainage patterns, including the Municipal Code. Chapter 153 of the City's Municipal Code controls the alteration of drainage features such as floodplains, stream channels, and natural protective barriers. Additionally, Chapter 155 of the City's Municipal Code provides regulations regarding stormwater runoff, including project design features that reduce and direct stormwater runoff. The GPU EIR concluded that impacts from altered drainage patterns, stormwater runoff, and flooding would be less than significant with adherence to General Plan policies and existing federal, state, and local requirements.

As discussed above, while the proposed General Plan Amendment would increase the allowable residential density on the Project site from 1 DU/AC to 3 DU/AC, the new land use designation and future projects on the site would still be subject to General Plan policies and existing regulations as related to drainage, stormwater runoff, and flooding. Therefore, impacts regarding altered drainage patterns, stormwater runoff and flooding from the GPA would be consistent with those identified in the GPU EIR and would be less than significant.

VENTANA Specific Plan

The City requires that all new development retain storm flows on site, and does not impact downstream properties. Per the City of Indio's requirements, "The basin shall be designed to retain the runoff from the worst case of the 1hr, 3hr, 6hr or 24hr duration, 100-year storm" and "There shall be no standing water in the retention basin after 72 hours of any storm event."

Proposed Drainage System

MDS Consulting prepared a Preliminary Drainage Report (Appendix H) that analyzed Project buildout. The site will be graded to direct drainage as surface flow into the proposed private streets, where proposed curb inlet catch basins will capture and convey stormwater to six (6) onsite retention basins. The basins will be of varying depths and capacities, and will accommodate, in total, 10.39 acre feet, sufficient to store the 100 year storm, with freeboard. A final hydrologic analysis will be required to demonstrate that the Project meets the City's standards when final plans are prepared. These standard requirements will assure that impacts associated with storm water retention remain less than significant.

Best Management Practices

To reduce discharge of pollutants into stormwater runoff from the site, the proposed Project must implement BMPs through the preparation and approval of a Water Quality Management Plan (WQMP) and Stormwater Pollution Prevention Program (SWPPP), both of which are requirements for the City's NPDES permit implementation. Implementation of BMPs will reduce pollutants of concern that may enter receiving retention basins and reduce short and long-term water quality impacts caused by the construction and operation of the proposed Project.

The development's proposed grading and drainage design has been developed to limit the diversion of existing flow patterns and maintain the existing runoff conditions for overflow pathways to extend the feasibility for the developed site conditions. By implementing onsite retention for the proposed Project, no significant impact to downstream water bodies is anticipated.

Approval of the WQMP, SWPPP, and the required BMPs will reduce impacts to surface waters by reducing siltation and eliminating pollutants in storm flows. With the implementation of this standard requirement, the impacts associated with surface water pollution will be less than significant.

Erosion and On- or Off-site Siltation

Adherence to City requirements, including WQMP best management practices, will ensure the Project site design will not result in erosion or siltation on- or off-site. The City's requirements include BMPs for the control of silts and other contaminants in flood waters, which will be applicable to the proposed Project.

Summary

The proposed Project will be required to comply with the City's storm water retention requirements, including the approval of a project-specific final hydrology study, WQMP and SWPPP prior to the issuance of grading permits. Implementation of these requirements will assure that the Project will not create or contribute water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff.

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

General Plan Amendment

While this issue was not directly addressed in the GPU EIR, the General Plan includes policies and programs to ensure the implementation of a groundwater management plan and a water quality control plan. The NPDES permit issued for the Whitewater River Watershed requires permittees, including the City of Indio, to implement regulatory requirements prescribed in the Water Quality Control Plan for the Colorado River Basin Region. The City, as a permittee, is required to exercise legal authority to require implementation of BMPs to the maximum extent practicable such that new development projects do not result in increases in pollutant loads and flows do not further degrade receiving waters. General Plan Policy IE-1.3 calls for NPDES Compliance. As noted, the City's Municipal Code Section 55.27 requires compliance with NPDES permits and allows the City to require proof of compliance prior to issuance of grading, building, or occupancy permits. The General Plan includes Policy CE-7.11, which would identify and protect aquifer recharge areas and ensure potential groundwater recharge occurs in conjunction with future development.

The GPU EIR stated that all future development projects would be required to comply with applicable state and local regulations relating to groundwater recharge, including the implementation of BMPs. As discussed above, while the proposed General Plan Amendment would increase the allowable residential density on the Project site from 1 DU/AC to 3 DU/AC, the new land use designation and future projects on the site will not change the type of land use allowed on the site (single family homes), and projects would still be subject to General Plan policies and existing regulations at all levels. No significant impact would occur as a result of the GPA regarding implementation of a water quality control plan or a sustainable groundwater management plan.

VENTANA Specific Plan

The proposed Project has been designed and includes facilities that will safely capture and convey stormwater runoff to properly designed retention facilities, where BMPs, including bio-infiltration will ensure that neither surface nor groundwater resources are adversely affected. As previously discussed under threshold a), above, the proposed Project has been designed in conformance with applicable water quality regulations of the City of Indio and the Regional Water Quality Control Board. A WQMP has been prepared for this Project and further ensures that the Project will not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

2.12.7 Mitigation Measures

Impacts relating to hydrology and water quality are less than significant, and no mitigation measures are required.

2.12.8 Significance After Mitigation

Impacts would be less than significant with implementation of General Plan policies, requirements of law and standard requirements, and no significant impacts would occur.

2.12.9 Cumulative Impacts

The study area for the GPU EIR (page 5-14) assessment of cumulative impacts to hydrology and water quality was the Whitewater Watershed, and study area for the assessment of impacts to groundwater was the combined area of the Desert Hot Springs, Indio, and Mission Creek groundwater subbasins. The EIR determined that future development facilitated by the GPU, combined with other development in the watershed, could result in the generation of a variety of runoff pollutants. However, future development projects in the City would be subject to federal and state regulations that protect water quality, and impacts related to water quality would not be cumulative considerable.

Additionally, growth accommodated by the General Plan, in addition to other development in the cumulative study area, could reduce groundwater infiltration and increase demand on overall groundwater supplies. However, all development would be required to comply with Policy CE-7.11 (protect recharge areas and ensure groundwater recharge occurs), as well as implementation of BMPs. Therefore, the General Plan would not result in a cumulatively considerable contribution to impacts related to groundwater recharge.

The GPU EIR also determined that future growth facilitated by the General Plan would have the potential to increase impervious surfaces, thereby increasing stormwater runoff that could increase erosion, flooding, or exceed the capacity of storm drain systems. However, development would be required to comply with regional stormwater permits and other requirements such that the General Plan would not make a considerable contribution to cumulative impacts related to increased stormwater runoff.

Compared to the GPU, maximum buildout of the proposed GPA and buildout of the VENTANA Specific Plan would result in a fractional increase in total build out dwelling units, and both would result in similar generation of pollutants and groundwater impacts as the current General Plan designation. The GPA and the Project are subject to the same policies, requirements of law and City requirements as all other new development projects in the City through build out of the General Plan. The Project, therefore, would result in only a marginal increase in development that would not contribute considerably to cumulative impacts on hydrology, water quality, and groundwater resources in the study area.

2.13 Land Use and Planning

2.13.1 Introduction

The Land Use and Planning section describes the existing land uses of the Project site and its surroundings, and evaluates potential Project impacts on those lands. The Project is analyzed in terms of consistency with General Plan and other land use planning documents. Land use regulations affecting the Project site are described, as are the Project's appropriateness, suitability, and compatibility with existing and planned land uses in the vicinity.

2.13.2 Thresholds of Significance

The thresholds of significance analyzed herein have been taken from Appendix G of the State CEQA Guidelines. For purposes of this EIR, the proposed Project would have a significant effect on existing and planned land use if it were to:

a) Physically divide an established community.

b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

The Initial Study determined that the Project would result in "No Impact' for threshold question a) above. Therefore, it is not analyzed further in this EIR.

2.13.3 Regulatory Framework

<u>Indio General Plan</u>
The City of Indio General Plan sets forth long-range goals, policies, and programs for land use development, natural resources management, provision of public services, and other community issues. The Land Use and Urban Design Element of the General Plan includes a Land Use Map, which applies land use designations to parcels of land throughout the city and guides long-term development and redevelopment. The Project site is designated Desert Estates Neighborhood on the City's General Plan land use map.

This section of the EIR analyzes in detail the individual goals and policies of the General Plan. Evaluation of the Project in the context of these policies will help determine the Project's appropriateness to the site and compatibility with City long-term goals.

<u>Indio Municipal Code</u>
Title XV Land Usage, Chapter 159 (Zoning Code) of the Indio Municipal Code implements the General Plan and guides the development and use of land in the City. It specifies development standards and other factors that determine development densities and intensities for each parcel of land.

Coachella Valley Multiple Species Habitat Conservation Plan

The Coachella Valley Multiple Species Habitat Conservation Plan and Natural Community Conservation Plan (CVMSHCP) is a comprehensive regional plan that seeks to balance the valley's economic, development, and growth needs with the conservation needs of a variety of plant and animal species and natural vegetation communities. The CVMSHCP, approved in 2008, protects more than 240,000 acres of open space and 27 sensitive biological species ("covered species"), and streamlines compliance with federal and state endangered species laws for a 75-year term. The CVMSHCP involves numerous jurisdictions and public agencies as permittees including the City of Indio. Overall management of the Plan is provided by the Coachella Valley Conservation Commission (CVCC), a joint powers authority of elected representatives.

2.13.4 Environmental Setting

The Coachella Valley is located in the central portion of Riverside County at the westernmost limits of the Sonoran Desert. The San Jacinto and San Bernardino Mountains form the western portions of the valley, while the Little San Bernardino and Santa Rosa Mountains form the northern and southern boundaries, respectively. Much of the urbanization in the Coachella Valley initially took place along the toe of the slopes of the Santa Rosa and San Jacinto Mountains and has spread progressively onto the valley floor and southeastward through the City of Coachella to the communities of Thermal and Mecca.

Roughly half of the General Plan planning area has been urbanized with the majority of vacant lands located in the City's sphere of influence (SOI). The two predominant land uses in the Planning Area are residential (13%) and public facilities/utilities (13%). Residential uses in Indio predominantly consist of single-family units with older neighborhoods located within the central areas of the City, and newer developments located in Residential Planned Developments in the northern, western, and southern areas of the City. Multi -family residential uses are generally located south of I-10, typically near commercial and office development. Mobile home parks are also scattered throughout Indio, most of which are gated communities.

2.13.5 Existing Conditions

The Project site is designated Desert Estates Neighborhood on the City's General Plan Land Use Map, which allows low-density residential development at 1 dwelling unit per acre (DU/AC) and agricultural uses. The City's Zoning Map currently designates the subject site as Country Estates Indio Ranchos Zone(s) (CEIR-1 & CEIR-2). Both CEIR-1 and CEIR-2 allow for low density, single-family residences and accessory structures such as detached garages, swimming pools, and playground equipment. The purpose of the CEIR zones is to promote the area's scenic characteristics and protect the rural countryside environment and existing equestrian uses.

The site is also located within the boundaries of the Southern Neighborhood Subarea, which is the area between the Central Neighborhoods and the Festival District, and supports a rural/resort lifestyle in a quiet and secluded living environment. The purpose of a subarea is to provide key strategies for maintaining the area's unique character as well as development improvements.

The surrounding area is comprised of single-family residential and vacant land uses. The residential development to the west of the site has an approximate density of 1.7 DU/AC; land to the north is partially developed with a density of 1 DU/AC; lands to the east and southeast are partially developed with homes on 5 acre lots; and lands to the south across Avenue 50 are developed with densities of about 3 units per acre in the City of La Quinta.

2.13.6 Project Impacts

b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

General Plan Amendment & VENTANA Specific Plan
The Project includes a General Plan Amendment from the current Desert Estates Neighborhood to a new designation, Transitional Neighborhood. Both General Plan text and map amendments are proposed. The map amendment would apply only to the 45 acres of the proposed Project.

Implementation of the GPA will not change the residential nature of the site's land use designation, but will increase the residential density from Desert Estates Residential (1 du/ac) to Transitional Neighborhood (0-3 du/ac), that could increase the site's density by 91 residential units, for a total of 136 units. The GPA does not propose changes to existing GPU goals, policies or programs.

The VENTANA Specific Plan proposes a residential development with a density of 2.28 du/ac. This density would be consistent with the Transitional Neighborhood designation proposed.

The follow discussion provides analysis of the Project's consistency with land use plans, including the General Plan, Municipal Code and Zoning, and the Habitat Conservation Plan (CVMSHCP). An analysis of applicable goals, policies and programs contained in the General Plan Update was conducted. The findings of that analysis are summarized below.

Goal LU-1: Citywide Urban Structure. An urban structure that enhances the quality of life of residents, meets the community's vision for the future, and weaves new growth areas together with established Indio neighborhoods.

Policies

LU-1.1 Overall city structure. Establish a clearly defined City structure by:

- Re-establishing the City's pedestrian-oriented Downtown as a community anchor with local and regional-serving civic, arts, education, and entertainment uses.
- Transforming the Midtown area into a mixed-use center with retail, commercial services, and residential uses in a walkable format.

- Maintaining and enhancing the Festival District as a key location for large-scale entertainment and recreational opportunities. This will be accomplished by enacting buffering standard through zoning for Festival District properties and surrounding non-Festival District properties to limit conflicts in the uses and operations of these properties.
- Creating mixed-use corridors along Highway 111, Monroe Street, Avenue 42, and Avenue 44 that contain a mix of retail, service, office, and residential uses. Corridors should have defined nodes that provide a mix of local- and regional-serving uses.
- Investing in existing residential neighborhoods adjacent to Downtown and Midtown.
- Infilling new residential neighborhoods arranged around neighborhood centers and community gathering spaces, such as schools and parks.
- Maintaining the I-10 Employment Corridor subarea as a critical economic engine for the City.
- Facilitating major, regional-serving commercial districts that provide a mix of commercial, entertainment, and service uses in a pedestrian-oriented format north of I-10 at Jackson Street and Avenue 40 to capitalize on regional transportation and access.
- Preserving and protecting natural open space and conservation areas in the Northern and Eastern Sphere subareas.

LU-1.3 Contiguous development. When development occurs outside the Downtown, Midtown, and existing central neighborhoods, locate new development adjacent to Indio's built environment to create a contiguous expansion of the City.

LU-1.5 Subareas. Implement the strategies identified for each distinct subarea in Indio in this General Plan.

Southern Neighborhoods Subarea Strategies:

- Keep neighborhoods stable
- Improve multi-modal access to Midtown and the Festival District
- Keep 20-acre minimum project master plan requirement in place for new development to maintain quality and cohesiveness.
- Allow for uses that can benefit and create synergies with activities and events in the Festival District.

Analysis: Future development of the site under the proposed GPA land use designation is subject to current GPU goals and policies and would be required to undergo project-level design and environmental review to ensure a project is consistent with the character and vision for the Project area. The GPA does not propose changes to existing GPU goals or policies, and therefore the GPA is consistent with the above goals and policies.

Implementation of the proposed GPA will facilitate the development of a mix of single family homes, which will contribute to the overall city structure envisioned in the General Plan by infilling a new residential neighborhood near neighborhood centers on Avenue 50 & Jefferson Street/Monroe Street. The Project site is located within biking/walking distance (0.5 miles) from the existing Ralphs shopping on Avenue 50 and Jefferson, which will provide residents with dining, shopping, and personal care serves.

The Project is also considered an infill location within biking/walking distance from several schools, including the Mountain Vista Elementary School (0.7 miles), Harriet Truman Elementary School (1.7 miles) and La Quinta Middle School (1.7 miles).

The proposed Project is considered a contiguous expansion of the City's Southern Neighborhoods because the proposed site is surrounded by existing residential development. In addition, the proposed height, massing, and architectural elements of the Project have been designed to maintain the existing visual character and quality of surrounding neighborhoods.

The GPA and the Project also implement the subarea strategies:

Keep neighborhoods stable. The Project is proposing a density of 2.3 units per acre, in a 320-acre area that is currently designated Desert Estates Neighborhood, which allows 1 DU/AC. However, development within the Desert River Estates project, which abuts the Project area on the west, is constructed at a density of 2 DU/AC, and is therefore inconsistent with the approved land use designation. The GPA will provide a transitional designation for the Project site which is consistent with abutting development. With implementation of the Project, the 80 lots located in Planning Area 2, which range in size from 11,500 to 20,600 square feet, distribute the larger lots on the outer boundary, consistent with the surrounding larger lots.

Improve multi-modal access to Midtown and the Festival District. The Project will result in the build out of Avenue 50 to its ultimate General Plan right of way along the entire project frontage, which will include an 8 foot wide sidewalk and a striped (Class II) bike lane. These facilities will increase non-vehicular access to the Festival Grounds to the east of the site.

Keep 20-acre minimum project master plan requirements in place for new development to maintain quality and cohesiveness. The GPA and the Project cover a 45± acre site, and therefore exceeds the minimum standard. The Specific Plan, as proposed, includes requirements for a cohesive and inter-related project which will have a high quality of development and provide common area amenities.

Allow for uses that can benefit and create synergies with activities and events in the Festival District. The Project proposes single family homes consistent with the existing neighborhood in which it is located. It will expand the housing opportunities in this portion of the City, but will not provide additional activities or events related to the Festival District, as that would be disruptive to the existing neighborhood.

Goal LU-2: Active Places. Indio is a City with active and comfortable places that encourage social interaction and community gathering.

Policies

LU-2.1 Walkable neighborhoods. Require all new neighborhoods to be pedestrian friendly by including features, such as short blocks, wide sidewalks, shaded streets, buildings that define and are oriented to streets or public spaces, traffic-calming features, convenient pedestrian street crossings, and safe streets designed for pedestrians, cyclists, and vehicles.

LU-2.2 Balanced land uses. Maintain a balanced land use pattern to support a broad range of housing choices, retail businesses, employment opportunities, educational and cultural institutions, entertainment spaces, and other supportive uses and within long-established Indio neighborhoods and new growth areas.

LU-2.3 Access to amenities. Strive to create development patterns such that the majority of residents are within one-half to one-mile walking distance of a variety of neighborhood-serving uses, such as parks, grocery stores, restaurants, places of worship, cafes, dry cleaners, laundromats, banks, hair care, pharmacies, civic uses, and similar uses.

LU-2.4 New gathering spaces. Require new developments to provide public parks, plazas, and squares that establish interesting gathering spaces in planned districts and neighborhoods. Require project developers to establish mechanisms, such as a Community Facilities District, to adequately maintain new parks, recreational facilities, and infrastructure.

Analysis: The implementation of the GPA and the proposed Project would result in a planned neighborhood with integrated activity areas, including a dog park, active and passive parks, and interconnected system of pedestrian ways to connect them. In addition, the implementation of the GPA will result in single family homes within ½ mile of jobs, shopping and schools.

The GPA will allow a more intense level of development than under current conditions, but this intensity also allows for the provision of neighborhood amenities unlikely in estate size 1-acre developments, including the existing developments to the north and southeast of the property. The GPA will facilitate the development of an internal local street system that encourages activity, and will contribute to the eventual build out of Avenue 50 with a widened sidewalk, and bicycle facilities to connect to the City-wide bike system.

The GPA and its implementation through the proposed Project will allow for the development of three housing types, on varying lot sizes, that will increase the diversity of housing for City residents.

Goal LU-7: New Neighborhoods. Neighborhoods that provide a variety of housing types, densities, designs and mix of uses and services that support healthy and active lifestyles.

Policies

LU-7.1 Complete neighborhoods. Through the development entitlement process, ensure that all new Neighborhoods (areas with a "Neighborhood" General Plan Designation) are complete and well-structured such that the physical layout and land use mix promote walking to services, biking and transit use, are family friendly, and address the needs of multiple ages and physical abilities. New neighborhoods should have the following characteristics:

- Contain short, walkable block lengths.
- Contain a high level of connectivity for pedestrians, bicycles and vehicles where practicable.
- Organize around a central focal point such as a park, school, civic building or neighborhood retail such that most homes are no more than one quarter-mile from this focal point.
- Have goods and services within a short walking distance.
- Contain a diversity of housing types, where possible.
- Have homes with entries and windows facing the street.
- Have a grid or modified grid street network (except where topography necessitates another street network layout).
- Provide a diversity of architectural styles.

LU-7.2 Balanced neighborhoods. Within the allowed densities and housing types, promote and allow for a range of housing and price levels within each neighborhood in order to accommodate diverse ages and incomes. For development projects larger than five acres, require that a diversity of housing types be provided and that these housing types be mixed rather than segregated by unit type.

Analysis: Future development of the site under the proposed GPA land use designation is subject to current GPU goals and policies and would be required to undergo project-level design and environmental review to ensure project components include an appropriate mix of amenities and design features that are consistent with the intent of complete and balanced neighborhoods. The GPA does not propose changes to existing GPU goals or policies, and therefore the GPA is consistent with the above goals and policies.

Implementation of the proposed GPA will facilitate development of 103 single family homes of various sizes and price-points, and will result in a new active and comfortable residential neighborhood consistent with the General Plan 'New Neighborhoods' goal. The proposed Project is designed to be walkable and well-connected with public areas such as a dog park and

landscaped open areas that are appropriate for all lifestyles and appealing to multi-generations. It also provides varied housing choices of smaller lots with single- or two-story homes and large lots (varied sizes) with single-story homes and ample backyard space.

Although the size and surroundings of the Project area limit the options to organize a neighborhood around a central focal point such as a park, school, or retail, the proposed site is within 0.5-1.5 miles biking/walking distance of a variety of amenities, such as schools, polo and golf clubs, places of worship, and various neighborhood retail at Avenue 50 & Jefferson Street including grocery stores, cafes, restaurants, dry cleaners, banks, hair care, and pharmacies. Also, newly approved stores in the area will increase and diversify local amenities for future residents.

Goal LU-4 High-Quality Building Design. A beautiful city with a high-quality architecture and building design.

Policies

LU-4.1 Quality design. Use simple, urban building forms made with permanent materials with high-quality detailing that stands the test of time.

LU-4.2 Scale and articulation. Use building organization and construction to derive scale and articulation rather than surface ornamentation.

LU-4.3 Building materials. Convey façade articulation through the strength, depth, and permanence of building materials. Thinner cladding materials, such as stucco, stone and masonry veneers, and wood or simulated wood, may be used when finished to appear as durable and authentic of the materials they simulate.

LU-4.4 Building entrances. Use visual and physical design cues within a building's design and entries to emphasize the building entrance and connections to public spaces.

LU-4.5 Iconic design. Allow iconic and memorable building designs, particularly on larger non-residential properties.

LU-4.6 Climate-appropriate design. Encourage the use of building techniques and materials that relate to Indio's warm and dry desert climate. Promote solar control and use of shade in building design and associated pedestrian amenities.

LU-4.7 Protect visual characteristics. Protect Indio's unique visual characteristics and views.

Analysis: Future development of the site under the proposed GPA land use designation is subject to current GPU goals and policies and would be required to undergo project-level design review by the City to ensure high quality architecture and design that is consistent with the character envisioned for the City and surrounding neighborhood. The GPA does not propose changes to existing GPU goals or policies, and therefore the GPA is consistent with the above goals and policies.

The proposed Project is consistent with the General Plan goal of High-Quality Building Design. Development in the Specific Plan area will follow the Santa Barbara Modern Architectural Style, drawing from both traditional and modern forms to create a cohesive neighborhood experience. Materials listed in the Specific Plan such as plaster wall exterior/finish, heavy timber columns, and dark wood to accentuate white walls are consistent with the building materials described in the General Plan. The design standards and guidelines, including building height limits and setbacks, will ensure the protection of the city's unique mountain views and visual characteristics.

Goal LU-6 Enhance Existing Neighborhoods. A City with well-maintained residential neighborhoods that support Downtown and Midtown.

Polices

LU-6.3 Sustainable residences. Encourage sustainable building practices during new construction or when buildings are substantially renovated.

LU-6.10 High-quality landscaping and fencing. Encourage property owners to maintain and improve their yards and the front facades of homes and to encourage the use of drought-tolerant landscaping. Prohibit front yard fences made from concrete blocks or chain links.

Analysis: The proposed GPA would result in up to 136 units, which is 91 additional residences than allowed under the current land use designation. The proposed Project would provide 103 units on the site. These units will support the City's economy, including the businesses in Downtown and Midtown. Future development of the site under the proposed GPA land use designation would be required to adhere to current California Building Codes which promote green building and energy efficiency principles for construction. The GPA does not propose changes to existing GPU goals or policies, nor does it propose changes to the Zoning Code, and therefore the GPA is consistent with the above goals and policies.

The Specific Plan addresses sustainability in Section III.F of the Plan, and promotes green building and energy efficiency principles for construction and operation. Drought-tolerant landscaping is encouraged by the City as well as the Specific Plan (Section III.C). Chain link fences are prohibited throughout the Specific Plan area as detailed in Section III.E, and white blocks may be used for walls but not as front yard fences.

Goal LU-12 Infrastructure Provision. Existing and future residents and businesses are adequately serviced by public services and infrastructure.

Policies

LU-12.2 Adequate infrastructure. Ensure adequate infrastructure and utility service levels before approving new development.

Analysis: The area in which the GPA is proposed is mostly built out and well served by existing utility networks, and adequate infrastructure and services are in place for new development, including the increased development resulting from the GPA.

Goal PR-2 High-Quality Parks. High-quality parks and recreational facilities that promote community health and are safe and convenient to access.

PR-2.8 New development. Ensure that new residential developments provide adequate on-site recreational and open space amenities consistent with the values and standards of the community and the needs of new development. Require projects to establish mechanisms, such as a Community Facilities District, to adequately maintain new parks and recreational facilities.

Analysis: The General Plan Amendment would require that development under the Transitional Neighborhood designation meet this goal and policy, and provide on-site recreation and open space. Under either the existing or proposed land use designation, a homeowners association would likely be created to maintain these recreational facilities. The Project will result in a managed community that will be responsible for the long term maintenance of the dog park, active and passive parks and internal facilities. The implementation of the proposed Project would implement this goal and policy.

Goal HE-2 Healthy Neighborhood Design. Neighborhoods designed to encourage a healthy lifestyle for people of all ages, income levels, and cultural backgrounds.
Policies

HE-2.1 Neighborhood design. Design neighborhoods to promote pedestrian and bicycle activity as alternatives to driving. This policy is implemented through the Land Use and Community Design Element.

HE-2.3 Universal park access. Increase access to existing and proposed parks and open spaces. Apply universal design principles to ensure that people of any culture, age, size, weight, race, gender, and ability can experience an environment that promotes their health, safety, and welfare. This policy is implemented through the Parks, Recreation, and Open Space Element.

Analysis: Future development of the site under the proposed GPA land use designation is subject to current GPU goals and policies and would be required to undergo project-level design review to ensure project components include an appropriate mix of amenities and design features that promote pedestrian and bicycle activity. The GPA does not propose changes to existing GPU goals or policies, and therefore the GPA is consistent with the above goals and policies.

The Specific Plan will result in a new residential neighborhood that is walkable/bikeable and provides a dog park and landscaped open areas with universal access based on community needs. In addition, the Project site is located within biking/walking distance (0.5 miles) from the existing

Ralphs shopping at Avenue 50 and Jefferson Street, which will provide future residents with dining, shopping, and personal care serves. The Project will also include active recreation, available to all residents to facilitate universal access, health and well being.

Goal HE-3 Environmental Quality. A City designed to improve the quality of the built and natural environments to reduce disparate health and environmental impacts.

Policies

HE-3.3 Construction pollution. Reduce particulate emissions from paved and unpaved roads, construction activities, and agricultural operations.

HE-3.4 Sensitive-receptor uses. Discourage development of sensitive land uses – defined as schools, hospitals, residences, and elder and childcare facilities – near air pollution sources that pose health risks – including freeways and polluting industrial sites.

Analysis: The General Plan Amendment, and ultimate development of the proposed project, will result in the development of a new residential neighborhood, which is a sensitive land use; however, the site is not near any air pollution sources that pose health risks – including freeways and polluting industrial sites. The impacts of both the GPA and the Project have been evaluated in Section 2.5, Air Quality, and have been found to be less than significant. The proposed development will include a dust control plan to reduce particulate emissions during construction. There will be no unpaved roads or agricultural operations at build out, ensuring the environmental quality for the sensitive land use.

Goal SE-1 Police Services. Excellent law enforcement and a reduction in criminal activities and focus on community policing.

SE-1.4 Crime Prevention Through Environmental Design. Promote Crime Prevention Through Environmental Design (CPTED) concepts, including, but not limited to:

- Controlling access by creating real and perceptual barriers to entry and movement through the use of fences or landscaping to define site boundaries, clearly defined pathways to guide movement, gates or doors to limit access, and signs to define appropriate activities.
- Maximizing opportunities to see and be seen through the use of lighting, windows, building orientation and location, proper selection of landscaping materials and regular maintenance, furniture arrangements, surveillance equipment, or other security or design measures.
- Clearly defining ownership and encouraging maintenance of properties through measures such as landscaping, front porches, fencing, variations in paving materials, or other elements to distinguish between private and public spaces. Display signs to establish ownership and keep buildings, yards, gardens, sidewalks, and other features well maintained, clean, and in working order.

Analysis: Development of the Project under the General Plan Amendment will utilize the Crime Prevention Through Environmental Design principles on design and maintenance of the neighborhood to keep it well maintained and secure. The establishment of a homeowners' association will assure permanent maintenance.

Goal SE-3 Fire Safety. A community safe from the risk of fire and with appropriate fire response standards.

SE-3.8 Development applications. Continue to review development applications for consistency with applicable fire and building code regulations, including emergency access/evacuation routes.

Analysis: The GPA will be subject to this goal and policy, and the implementation of the Project will provide for emergency access and evacuation to the satisfaction of the Fire Department, which has approved its access for this purpose.

Goal SE-4: Seismic Hazards. A community that is minimally affected and less vulnerable to earthquakes and seismic hazards.

SE-4.1 Development plan review. Require all new structures to be designed in accordance with the most recent California Building Code adopted by City Council, including the provisions regarding seismic loads, lateral forces and grading and not built across the trace of an active fault.

Analysis: The GPA does not propose changes to General Plan goals and polices, and future development of the site shall comply with General Plan goals and policies, zoning and building code requirements.

The proposed development will be designed in accordance with the most recent California Building Code to avoid and/or mitigate potential geological hazards to the maximal extent. As described in Section 2.9, the City's building code is designed to reduce impacts associated with geological hazards to less than significant levels.

Goal CE-2 Water Conservation. Sustainable domestic water facilities and water conservation measures to effectively meet current and future demand.

Policies

CE-2.3 New development requirements. Require new development projects to implement water conservation measures that are equivalent to or exceed CalGreen Tier One or other applicable standards in effect at the time of development.

CE-2.4 Drought-tolerant landscaping. Exceed State landscaping water efficiency standards by requiring the use of drought tolerant landscaping, minimizing the use of turf, and encouraging the retrofitting of existing irrigation systems

CE-2.5 Water-efficient landscaping and appliances. Encourage the retrofitting of existing water-intensive appliances and irrigation systems. Continue to disseminate information about the CVWD and IWA rebate programs.

Analysis: The GPA does not propose changes to General Plan goals and polices. The development of the Project site will be required to implement these conservation policies, and those contained in the building code to assure water efficiency and a reduction in water use.

Goal CE-8 Historic, Archaeological, and Paleontological Resources. Historic, archaeological, and paleontological resources preserved for their scientific, educational, aesthetic, and cultural values.

Policies

CE-8.1 Site plan review. Ensure adequate site plan review and mitigation measures are implemented for the development of sites with the potential to contain historic, archaeological, and paleontological resources.

CE-8.4 Monitoring. Require monitoring on sites where grading has the potential to impact subsurface cultural and paleontological resources during excavation and construction activities.

Analysis: Future development of the site under the proposed GPA land use designation is subject to current goals and policies and would be required to undergo project-level design review to address potential impacts to cultural, historical, paleontological, and tribal resources, as appropriate. The impacts to these resources are analyzed in Sections 2.7, 2.9 and 2.19, and have been found to result in less than significant impacts.

Municipal Code and Zoning Consistency

The City's Zoning Map designates the site as Country Estates Indio Ranchos Zone(s) (CEIR-1 & CEIR-2). Both CEIR-1 and CEIR-2 allow for low density, single-family residences and accessory structures such as detached garages, swimming pools, and playground equipment. The GPA does not propose or require a zone change. Development of the site under the proposed GPA land use designation would be reviewed by the City and assessed for adherence to, and compatibility with, applicable zoning code rules and regulations.

The proposed Specific Plan would supersede the current zoning designations on the Project site and will guide the development of the Project overall. The proposed Specific Plan establishes the planning principles, land use policies, development standards, and design guidelines for the Project. All development on the Project site shall adhere to the standards and requirements set forth in the Specific Plan.

Habitat Conservation Plan (CVMSHCP) Consistency

The City of Indio is a signatory to and participates in the implementation of the CVMSHCP. The subject property is located within the boundaries of the CVMSHCP but is outside the boundaries of any of the Plan's Conservation Areas. Lands not developed prior to 1996 are subject to the payment of a Development Mitigation Fee to mitigate impacts of urban development to covered species. The site is not within or adjacent to a CVMSHCP-designated Conservation Area; thus, the implementation of either the General Plan Amendment or the proposed Project would not conflict with the provisions of an adopted habitat conservation plan, natural community conservation plan, or other related plans designed to avoid an environmental impact.

Conclusion

Future buildout of the site under the proposed GPA will result in residential development consistent with surrounding land uses. The Project would increase the residential density by 91 units with implementation of the GPA, and 103 total units, or 58 units when compared to the existing land use designation, under the Specific Plan. Neither the GPA nor the Specific Plan propose changes to existing GPU goals and policies or zoning code standards.

Development of the site under the proposed Project would be subject to project-level review by the City and comply with General Plan goals and policies pertaining to biological and cultural conservation and preservation, sustainable building design, energy and water efficiency, and public health and safety. The levels of service provided by local providers and infrastructure will assure that adequate levels of service are maintained and remain compatible with existing and planned land uses in the vicinity. Also see Sections 2.16: Public Services, 2.18: Transportation, and 2.20: Utilities and Service Systems.

Additionally, the proposed Project would advance the efforts of the City's Climate Action Plan to comply with State and regional efforts to reduce GHG emissions in accordance with SB 32 and SB 375. As discussed in Section 2.10, buildout of the proposed Project would result in per capita emissions consistent with the reduction targets set forth in the CAP. By complying with the CAP, the Project is consistent with the SCAG RTP/SCS, which is considered a supplemental plan governing land use and development in the region.

As demonstrated above, the proposed GPA and implementation of the Project would not conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect, and impacts would be less than significant.

2.13.7 Mitigation Measures

No significant impacts would occur, and no mitigation measures are required.

2.13.8 Significance After Mitigation

Impacts associated with Land Use and Planning will be less than significant.

2.13.9 Cumulative Impacts

The GPU EIR determined that cumulative impacts associated with land use could result if the growth planned in the General Plan would conflict with land use plans in the region and become incompatible or unsustainable.

The study area for the GPU EIR (page 5-16) assessment of cumulative impacts to land use was the City and neighboring jurisdictions. The EIR determined that the General Plan would not conflict with any relevant regional or local plans, or a habitat management plan. Specifically, the General Plan was found to be consistent with the Riverside County General Plan, SCAG RTP/SCS, and SCAG Sustainability Planning Grant Program. Because the General Plan would be consistent with and/or supplement adopted plans and regulations governing land use and development in the region, the General Plan would not make a considerable contribution to cumulative impacts.

Neither the GPA nor the Specific Plan propose changes to existing GPU goals and polices or zoning. Any cumulative project impacts related to land use would be consistent with impacts previously analyzed in the GPU EIR. There are no potential project conflicts or inconsistencies with applicable adopted plans, policies and regulations, and the Project, therefore, would not make a considerable contribution to cumulative land use impacts.

2.14 Noise

2.14.1 Introduction

This section of the EIR analyzes the potential impacts associated with noise created by the proposed Project, and the noise environment in the area which could affect the proposed Project. In order to develop a quantified analysis of these potential impacts, a technical report was prepared by KW Air Quality and Noise LLC[1] (Appendix B) The analysis and findings of

2.14.2 Thresholds of Significance

a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies;

b) Generation of excessive groundborne vibration or groundborne noise levels;

c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels;

The Initial Study determined that the Project would result in "No Impact" for threshold question c), above. Therefore, it is not analyzed further in this EIR.

2.14.3 Regulatory Framework

Federal

The Noise Control Act of 1972 was enacted to promulgate noise emission standards for interstate commerce, assist state and local abatement efforts and encourage noise education and research.

The Act is implemented by a number of agencies, including the Occupational Safety and Health Administration (OSHA) agency, which limits noise exposure of workers to 90 dB L_{eq} or less for 8 continuous hours or 105 dB L_{eq} or less for 1 continuous hour. The Department of Transportation (DOT) assumed a significant role in noise control through its various operating agencies. The Federal Aviation Administration (FAA) regulates noise of aircraft and airports. Surface transportation system noise is regulated by multiple agencies, including the Federal Transit Administration (FTA), the Urban Mass Transit Administration (UMTA), and the Federal Highway Administration (FHWA).

[1] Noise Impact Analysis Ventana, prepared by KW Air Quality and Noise LLC, February 18, 2021.

The federal government actively advocates that local jurisdictions use their land use regulatory authority to arrange new development in such a way that "noise sensitive" uses are either prohibited from being sited adjacent to a highway or, alternately that the developments are planned and constructed in such a manner that potential noise impacts are minimized.

Since the federal government has preempted the setting of standards for noise levels that can be emitted by transportation sources, the City is restricted to regulating the noise generated by the transportation system through nuisance abatement ordinances and land use planning.

State

General Plan Noise Elements

State law requires that all counties and cities develop, in their General Plan, a Noise Element that effectively limits the exposure of sensitive receptors to excessive noise levels. The State of California General Plan Guidelines 2017, published by the California Governor's Office of Planning and Research (OPR), provide guidance for the compatibility of projects within areas of specific noise exposure. The OPR Guidelines identify acceptable and unacceptable community noise exposure limits for various land use categories. Where the "normally acceptable" range is used, it is defined as the highest noise level that should be considered for the construction of buildings which do not incorporate treatment or noise mitigation. The "conditionally acceptable" or "normally unacceptable" ranges include conditions calling for detailed acoustical study prior to the construction or operation of the proposed project.

California Noise Control Act of 1973

Pursuant to Sections 46000 through 46080 of the California Health and Safety Code, known as the California Noise Control Act of 1973, the State Legislature found that excessive noise is a serious hazard to the public health and welfare and that exposure to certain levels of noise can result in physiological, psychological, and economic damage. The state has a responsibility to protect the health and welfare of its citizens by the control, prevention, and abatement of noise. It is the policy of the state to provide an environment for all Californians that is free from noise that jeopardizes their health or welfare.

State regulations (8 California Code of Regulations, Section 5095) also address worker exposure to noise levels. These regulations limit worker exposure to noise levels of 85 dBA or lower over an 8-hour period. The state has not established noise levels for non-work-related environments.

Local

City of Indio General Plan

The City's General Plan adopted a modified Noise Land Use Compatibility Matrix to establish standards for outdoor noise levels. The matrix identified that noise levels of 60 dBA CNEL are acceptable, and that 75 dBA CNEL is conditionally acceptable for single family land uses.

Table 2.14-1
City of Indio Noise Compatibility Guidelines[1]

Land Use Category		Exterior Noise Level (CNEL)						
		50	55	60	65	70	75	80
A	Residential – single family residences, mobile homes, senior housing, convalescent homes							
B	Residential – multi-family residences, mixed-use (commercial/residential)							
C	Transient lodging – motels, hotels, resorts							
D*	Schools, churches, hospitals, nursing homes, child care facilities							
E*	Passive recreational parks, nature preserves, contemplative spaces, cemeteries							
F*	Active parks, golf courses, athletic fields, outdoor spectator sports, water recreation							
G*	Office/professional, government, medical/dental, commercial, retail, laboratories							
H*	Industrial, manufacturing, utilities, agriculture, mining, stables, ranching, warehouse, maintenance/repair							

Acceptable: Specified land use is satisfactory, based upon the assumption that any buildings involved are of normal construction, without any special noise insulation requirements.

Conditionally Acceptable: New construction or development should be undertaken only after a detailed noise analysis is conducted to determine if noise reduction measures are necessary to achieve acceptable levels for land use. Criteria for determining exterior and interior noise levels are listed in Table N-2, Noise Standards. If a project cannot mitigate noise to a level deemed Acceptable, the appropriate county decision-maker must determine that mitigation has been provided to the greatest extent practicable or that extraordinary circumstances exist.

Unacceptable: New construction or development should generally not be undertaken.

The General Plan also established the following goals and policies relating to noise.

Goal NE-1 Land Use Compatibility. A City where noise exposure is minimized for those living, working, and visiting the community.

Policy NE 1.1 Sensitive Receptors. Protect noise-sensitive uses, such as residences, schools, health care facilities, hotels, libraries, and churches, from excessive noise levels through land use capability/ adjacency, build design, and noise ordinance enforcement.

Policy NE 1.2 Noise Compatibility. Apply the Noise Compatibility Matrix, shown in Table 3, as a guide for planning and development decisions. The City will require projects involving new development or modifications to existing development to implement mitigation measures, where necessary, to reduce noise levels to at least the normally compatible range shown in the City's Noise Compatibility Matrix shown in Table 3. Mitigation measures should focus on architectural features and building design and construction, rather than site design features, such as excessive setbacks, berms, and sound walls, to maintain compatibility with adjacent and surrounding uses.

Policy NE 1.6 Limit on Hours of Operation. Limit delivery or service hours for stores and businesses with loading areas, docks, or trash bins that front, side, border, or gain access on driveways next to residential and other noise sensitive areas, such as residences, schools, hospitals, religious meeting spaces, and recreation areas.

Policy NE 1.7 Land Use and Community Design. Prioritize the building design and character policies in the Land Use and Community Character Element over those in the Noise Element to ensure that new development meets the design vision of the city. This policy will not apply when noise levels are clearly in the incompatible range as shown in the City's Noise Compatibility Matrix shown in Table 3.

Goal NE-2 Mobile Noise Sources. A City with minimal mobile source-generated noise levels.

Policy NE 2.4 Roadway Noise. Implement the policies listed under Goal 1 to reduce the impacts of roadway noise on noise-sensitive receptors where roadway noise exceeds the normally compatible range shown in the City's Noise Compatibility Matrix shown in Table 3.

Policy NE 2.5 Traffic Calming. Require the use of traffic calming measures such as reduced speed limits or roadway design features to reduce noise levels where roadway noise exceeds the normally compatible range shown in the City's Noise Compatibility Matrix shown in Table 3.

Goal NE-3 Stationary Noise Sources. A City with minimal stationary source-generated noise levels.

Policy NE 3.1 Noise Ordinance. Minimize noise conflicts between neighboring properties through enforcement of applicable regulations, such as the City's Noise Control Ordinance.

Policy NE 3.4 Construction Noise. Require development to minimize the exposure of neighboring properties to excessive noise levels from construction-related activity during all phases of construction.

City of Indio Municipal Code

Section 95 of the City's Municipal Code addresses noise disturbances ranging from leaf blowers to vehicle noise and vibrations, and including operating hours for some uses, and construction hours. Section §95C.08 limits construction times and days as follows:

Pacific Standard Time.

(a) Monday through Friday, 7:00 a.m. through 6:00 p.m.
(b) Saturday, 8:00 a.m. through 6:00 p.m.
(c) Sunday, 9:00 a.m. through 5:00 p.m.
(d) Government Holidays, 9:00 a.m. through 5:00 p.m.

Pacific Daylight Time.

(a) Monday through Friday, 6:00 a.m. through 6:00 p.m.
(b) Saturday, 7:00 a.m. through 6:00 p.m.
(c) Sunday, 9:00 a.m. through 5:00 p.m.
(d) Government Holidays, 9:00 a.m. through 5:00 p.m.

2.14.4 Environmental Setting

Sound is a pressure wave which is created by a vibrating object. It is technically described in terms of amplitude (loudness) and frequency (pitch).[2] The standard unit of sound amplitude measurement is the decibel (dB). The decibel scale is a logarithmic scale that describes the physical intensity of the pressure vibrations that make up any sound. The pitch of the sound is related to the frequency of the pressure vibration. Since the human ear is not equally sensitive to a given sound level at all frequencies, a special frequency-dependent rating scale has been devised to relate noise to human sensitivity. The A-weighted decibel scale (dBA) provides this compensation by discriminating against frequencies in a manner approximating the sensitivity of the human ear.

[2] Noise and its Measurements by EPA (1961).

Noise is typically defined as unwanted sound. A typical noise environment consists of a base of steady ambient noise that is the sum of many distant and indistinguishable noise sources. Superimposed on this background noise is the sound from individual local sources. These can vary from an occasional aircraft or train passing by to virtually continuous noise from traffic on a major highway. **Table 2.14-2** illustrates representative noise levels in the environment.

Table 2.14-2
Representative Environmental Noise Levels

Common Outdoor Activities	**Noise Level (dBA)**	**Common Indoor Activities**
	-110-	Rock Band
Jet Fly-over at 100 feet	**105**	
	-100-	
Gas Lawnmower at 3 feet	**95**	
	-90-	
	85	Food Blender at 3 feet
Diesel Truck going 50 mph at 50 feet	**-80-**	Garbage Disposal at 3 feet
Noisy Urban Area during Daytime	**75**	
Gas Lawnmower at 100 feet	**-70-**	Vacuum Cleaner at 10 feet
Commercial Area	**65**	Normal Speech at 3 feet
Heavy Traffic at 300 feet	**-60-**	
	55	Large Business Office
Quiet Urban Area during Daytime	**-50-**	Dishwasher in Next Room
	45	
Quiet Urban Area during Nighttime	**-40-**	Theater, Large Conference Room (background)
Quiet Suburban Area during Nighttime	**35**	
	-30-	Library
Quiet Rural Area during Nighttime	**25**	Bedroom at Night, Concert Hall (background)
	-20-	
	15	
	-10-	
	5	
Lowest Threshold of Human Hearing	**-0-**	Lowest Threshold of Human Hearing

Source: California Department of Transportation, Technical Noise Supplement, October 1998. http://www.dot.ca.gov/hq/env/noise/pub/Technical%20Noise%20Supplement.pdf, accessed February 2019.

Environmental noise levels are generally considered low when the CNEL is below 45 dBA, moderate in the 45–60 dBA range, and high above 60 dBA. Noise levels greater than 85 dBA can cause temporary or permanent hearing loss.

Generally, a difference of 3 dBA over 24 hours is a barely-perceptible increase to most people. A 5 dBA increase is readily noticeable, while a difference of 10 dBA would be perceived as a doubling of loudness. Noise levels from a particular source generally decline as distance to the receptor increases. A commonly used rule of thumb for roadway noise is that for every doubling of distance from the source, the noise level is reduced by about 3 dBA. Noise from stationary or point sources is reduced by about 6 dBA for every doubling of distance. Noise levels may also be reduced by intervening structures; generally, a single row of buildings between the receptor and the noise source reduces the noise level by about 5 dBA.[3]

There are several rating scales to analyze the adverse effect of community noise on people. Since environmental noise fluctuates over time, these scales consider that the effect of noise upon people is largely dependent upon the total acoustical energy content of the noise, as well as the time of day when the noise occurs. Those that are applicable to this analysis are as follows:

- **Leq –** An Leq or equivalent energy noise level is the average acoustic energy content of noise for a stated period of time. Thus, the Leq of a time-varying noise and that of a steady noise are the same if they deliver the same acoustic energy to the ear during exposure. For evaluating community impacts, this rating scale does not vary, regardless of whether the noise occurs during the day or the night.

- **Lmax:** Is the maximum instantaneous noise level experienced during a given period of time.

- **Lmin:** Is the minimum instantaneous noise level experienced during a given period of time.

- **CNEL:** The Community Noise Equivalent Level is a 24-hour average Leq with a 5 dBA "weighting" during the hours of 7:00 PM to 10:00 PM and a 10 dBA "weighting" added to noise during the hours of 10:00 PM to 7:00 PM to account for noise sensitivity in the evening and nighttime, respectively. The logarithmic effect of these additions is that a 60 dBA 24 hour Leq would result in a measurement of 66.7 dBA CNEL.

Fundamentals of Environmental Groundborne Vibration

Vibration is sound radiated through the ground. Vibration can result from a source (e.g., train operations, motor vehicles, machinery equipment, construction equipment etc.) causing the adjacent ground to move, thereby creating vibration waves that propagate through the soil to

[3] Highway Traffic Noise Analysis and Abatement Policy and Guidance, U.S. Department of Transportation, https://www.fhwa.dot.gov/environMent/noise/regulations_and_guidance/polguide/polguide02.cfm, accessed March 2019.

the foundations of nearby buildings. This effect is referred to as ground-borne vibration. Ground-borne vibration is measured as peak particle velocity (PPV) in inches per second.[4]

Most perceptible indoor vibration is caused by sources within buildings such as the operation of mechanical equipment, movement of people, or the slamming of doors. Typical outdoor sources of perceptible ground-borne vibration are construction equipment, steel-wheeled trains, and traffic on rough roads. If a roadway is smooth, the ground-borne vibration from traffic is rarely perceptible.

2.14.5 Existing Conditions

In order to establish current conditions in the area of the proposed Project, noise monitoring was conducted on the site. As shown below, locations were distributed throughout the Project site, to develop a broad understanding of the noise environment.



Table 2.14-3 describes the monitoring locations, and provides the resulting noise levels.

[4] Basic Ground-Borne Vibration Concepts (Chapter 7), https://pdfs.semanticscholar.org/dc7a/51aa1841a144497fa81cf3267fa425ce1604.pdf, accessed March 2019.

Table 2.14-3
Existing Noise Level Measurements

Site Location	Description	Leq	LMAX	LMIN
NM 1	Adjacent to the residential receptor southeast of the project site	48.7	61.2	40.4
NM 2	Adjacent to the residential receptors southeast and east of the project site	50.5	62.9	42.3
NM 3	Adjacent to the residential receptors northeast of the project site	41.6	50.5	37.0
NM 4	Adjacent to the residential receptors west of the project site	45.9	61.5	36.9
NM 5	Adjacent to the residential receptors south of the site, south of Avenue 50.	72.1	82.3	44.8

As shown in the Table, the noise environment on the Project site is relatively quiet, with the exception of the area adjacent to Avenue 50. The primary source of noise in the Project area is generated by traffic on Avenue 50. It is important to note that noise monitoring was undertaken in February of 2020, prior to the COVID pandemic, which caused substantial regional decreases in vehicle trips. Therefore, the monitored noise levels are representative of normal operating conditions in the area.

2.14.6 Project Impacts

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;

General Plan Amendment

The General Plan Amendment would increase the density of development on the site by up to 91 units. The proposed Transitional Neighborhood designation would not change any goals or policies of the General Plan. Rather, it would be required to be consistent with these goals as policies. As enumerated above, Policy NE-1.1 requires that sensitive receptors, including homes, be protected from high noise levels, and that new development reduce noise levels, if necessary, to meet the Noise Compatibility Matrix shown in **Table 2.14-3** above. Policy NE-1.7 allows the Land Use and Community Character Element's policies to supersede noise policies in order to meet the design vision of the City. Policy NE-2.4 requires that roadway noise be mitigated for sensitive receptors, and Policy NE-3.4 requires that construction noise exposure be limited on neighboring properties. As analyzed below, the General Plan Amendment will not be incompatible with these policies, and will not cause noise levels to rise in a manner which would exceed General Plan standards.

The General Plan also requires, through Implementation Action Noise 5, the preparation of noise impact analyses for new development, to assure that General Plan standards are met. The proposed General Plan Amendment and the Project have been analyzed consistent with this Implementation Action.

The GPU EIR analyzed noise levels on Avenue 50, between Jefferson Street and Madison Street. This analysis concluded that at General Plan build out, the 60 dBA CNEL noise contour would occur at 427 feet from the centerline; the 65 DBA CNEL contour at 198 feet from centerline; and the 70 dBA CNEL contour at 92 feet from the centerline. This analysis is based on the assumption that Avenue 50 would be built to its General Planned full width. The GPU EIR further found that the increases resulting from General Plan build out would result in an increase of 6 DBA on this segment, which is significant without mitigation. In order to mitigate this impact, the GPU EIR required the implementation of Mitigation Measure NOS-1, which requires the use of noise-reducing paving materials on Avenue 50, in addition to conventional mitigation such as noise barriers (walls) between noise sources and sensitive receptors. With implementation of the mitigation measure and standard reduction techniques, the GPU EIR found that noise impacts would be reduced on City streets to less than significant levels, except for three roadway segments on Madison Street, Dillon Road and Avenue 44. None of these segments occur in the vicinity of the proposed Project.

As it relates to construction noise and vibration, the GPU EIR identified that the Implementation Action 5, requiring the preparation of noise studies, would be required to assure that the impacts of construction of new development on adjacent properties would be kept at less than significant levels. The noise analysis has been completed as it relates to the proposed Project, and is described below. The construction impacts associated with development of the site were found to be less than significant. Therefore, the General Plan Amendment's impacts on construction noise would also be expected to be less than significant.

The implementation of the proposed GPA and the proposed Project are subject to the policies, implementation actions and mitigation measures of the General Plan. Therefore, the impacts of the proposed GPA were quantified in a project-specific noise study, and the results of the analysis are provided below.

Operational Noise Impacts

In order to assess the impacts of the General Plan Amendment on local conditions, the noise analysis applied the maximum build out potential to the noise environment in 2022, the Project's anticipated opening year.

Table 2.14-4
General Plan Amendment Traffic Noise Contributions to Buildout (2022) Scenario

Road Segments	Opening Year (2022) without Project		Opening Year (2022) with Maximum Density Project			Is the Increase Significant ?
	ADT	dB CNEL	ADT	Total	Project-Specific Increase	
North/South						
Jefferson Street						
n/o Avenue 48	23,400	71.4	23,600	71.4	0.0	**No**
n/o Avenue 49	31,300	72.7	31,700	72.7	0.0	**No**
s/o Avenue 49	29,200	72.4	29,600	72.4	0.0	**No**
s/o Avenue 50	19,300	70.6	19,400	70.6	0.0	**No**
Verano Drive						
s/o Avenue 50	900	57.2	900	57.2	0.0	**No**
Madison Street						
n/o Avenue 49	9,000	67.2	9,100	67.3	0.1	**No**
s/o Avenue 49	8,600	67.0	8,700	67.1	0.1	**No**
s/o Avenue 50	8,100	66.8	8,100	66.8	0.0	**No**
Hjorth Street						
s/o Avenue 49	500	54.7	600	55.5	0.8	**No**
Monroe Street						
n/o Avenue 50	12,100	68.5	12,400	68.6	0.1	**No**
s/o Avenue 50	9,800	67.6	9,900	67.7	0.1	**No**
East/West						
Avenue 48						
w/o Jefferson Street	17,300	70.1	17,400	70.1	0.0	**No**
e/o Jefferson Street	18,400	70.3	18,500	70.4	0.1	**No**
Avenue 49						
w/o Jefferson Street	1,000	57.7	1,000	57.7	0.0	**No**
e/o Jefferson Street	4,300	64.0	4,300	64.0	0.0	**No**
w/o Madison Street	3,300	62.9	3,300	62.9	0.0	**No**
e/o Madison Street	3,200	62.8	3,200	62.8	0.0	**No**
Avenue 50						
w/o Jefferson Street	9,000	67.2	9,100	67.3	0.1	**No**
e/o Jefferson Street	11,900	68.5	12,500	68.7	0.2	**No**
w/o Madison Street	11,300	68.2	11,900	68.5	0.3	**No**
e/o Madison Street	9,700	67.6	10,300	67.8	0.2	**No**
e/o Hjorth Street	9,900	67.7	10,400	67.9	0.2	**No**
e/o Monroe Street	12,700	68.7	12,900	68.8	0.1	**No**

*The uniform distance of 50 feet from centerline allows for direct comparisons of potential increases or decreases in noise levels based upon various traffic scenarios; however, at this distance, no specific noise standard necessarily applies.

As shown in **Table 2.14-4** the implementation of the General Plan Amendment, and its resulting traffic would result in noise increases on surrounding roadways ranging from 0.0 to 0.8 dBA, which would be an imperceptible increase to the human ear. On this basis, the proposed General Plan Amendment would have less than significant impacts on noise levels in the short term.

Analysis of the impacts of the General Plan Amendment on build out conditions is provided in Section 2.14.9, Cumulative Impacts.

VENTANA Specific Plan

The proposed Project will generate noise during construction and operation. Both were assessed in the noise analysis.

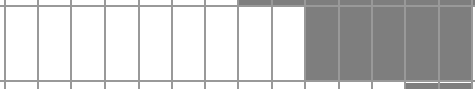
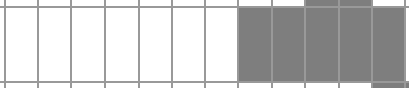
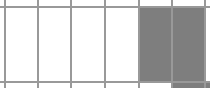
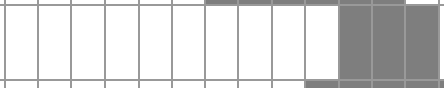
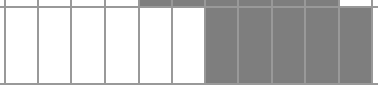
Construction Noise Impacts

Although the Project's construction will be regulated by the City's construction noise hours, which limit construction activities to the less sensitive daytime hours, this requirement does not necessarily reduce the impacts of construction noise associated with the Project. As a result, the analysis considered the potential noise levels which could be expected at the nearby sensitive receptor locations monitored on the Project site (please see Section 2.14.5 above).

Because the City has not adopted a numerical threshold for construction noise, the Federal Transit Administration (FTA) Transit Noise and Vibration Impact Assessment (2006) criteria were used to determine whether construction noise generated by the Project would be significant. The FTA standard for residential uses is 80 dBA L_{eq} averaged over an 8-hour period ($L_{eq\ (8\text{-}hr)}$ for daytime activities. The daytime standard was used, since the City's construction hour restrictions would limit construction to daytime hours.

The analysis utilized the construction equipment assumptions of the air quality analysis to develop potential noise levels generated by construction (please see Appendix B, Air Quality modeling). The analysis then considered the noise levels generated by this equipment, based on US Environmental Protection Agency noise levels, as shown in **Table 2.14-5**, below.

Table 2.14-5
Typical Construction Equipment Noise Levels

EQUIPMENT			NOISE LEVEL (dBA) AT 50 FEET
			60 70 80 90 100 110
EQUIPMENT POWERED BY INTERNAL COMBUSTION ENGINES	EARTH MOVING	Compacters (Rollers)	
		Front Loaders	
		Backhoes	
		Tractors	
		Scrapers, Graders	
		Pavers	
		Trucks	
	MATERIAL HANDLING	Concrete Mixers	
		Concrete Pumps	
		Cranes (Moveable)	
		Cranes (Derrick)	
	STATIONARY	Pumps	
		Generators	
		Compressors	
IMPACT EQUIPMENT		Pneumatic Wrenches	
		Jack Hammers and Rock Drills	
		Pile Drivers	
OTHER		Vibrators	
		Saws	

Source: United States Environmental Protection Agency, 1971, "Noise from Construction Equipment and Operations, Building Equipment, and Home Appliances," NTID 300-1.

The noise levels on a construction site vary based on the topography, the phase of construction, and the type of equipment used. Typically, the grading phase of a residential project generates the greatest amount of noise due to the heavy equipment used during this period. Typical construction days, according to the noise analysis, generate 84 dBA CNEL as a distance of 50 feet from the noise source. The noise levels will vary with the movement of equipment, its level of power, and the duration of the activity. The noise analysis used a number of factors in determining construction noise levels, which can be found in Appendix I. The results of the analysis are provided in **Table 2.14-6**, below, and represent the noise level at the façade of the closest noise receptor at each of the modeled locations. As shown in the Table, the noise levels generated by construction will not exceed the 80 dBA L_{eq} FTA standard, and with the implementation of the Best Management Practices included in Mitigation Measure NOI-1, will be reduced by 10 dB at each of the locations. As a result, impacts to surrounding sensitive receptors from the construction of the proposed Project will be less than significant, with mitigation.

Table 2.14-6
Estimated Construction Noise Levels at Sensitive Receptors without and with BMPs

Construction Phase	Receptor Location	Existing Ambient Noise Levels (dBA Leq)[1]	Reduction in dBA from BMPs	Construction Noise Levels at Receptor Locations (dBA Leq)[2]	Construction Noise Levels With BMPs (dBA Leq)[3]	Increase Over Ambient (dBA)
Grading	Southeast (NM1)	48.7	10.0	61.6	51.6	2.9
	Southeast and East (NM2)	50.5	10.0	60.8	50.8	0.3
	Northeast (NM3)	41.6	10.0	65.0	55.0	13.4
	West (NM4)	45.9	10.0	64.5	54.5	8.6
	South (NM5)	72.1	10.0	58.2	48.2	-23.9
Building Construction	Southeast (NM1)	48.7	10.0	56.3	46.3	-2.4
	Southeast and East (NM2)	50.5	10.0	55.4	45.4	-5.1
	Northeast (NM3)	41.6	10.0	59.6	49.6	8.0
	West (NM4)	45.9	10.0	59.2	49.2	3.3
	South (NM5)	72.1	10.0	52.8	42.8	-29.3
Paving	Southeast (NM1)	48.7	10.0	57.7	47.7	-1.0
	Southeast and East (NM2)	50.5	10.0	56.8	46.8	-3.7
	Northeast (NM3)	41.6	10.0	61.0	51.0	9.4
	West (NM4)	45.9	10.0	60.6	50.6	4.7
	South (NM5)	72.1	10.0	54.2	44.2	-27.9
Architectural Coating	Southeast (NM1)	48.7	10.0	48.3	38.3	-10.4
	Southeast and East (NM2)	50.5	10.0	47.5	37.5	-13.0
	Northeast (NM3)	41.6	10.0	51.7	41.7	0.1
	West (NM4)	45.9	10.0	51.2	41.2	-4.7
	South (NM5)	72.1	10.0	44.9	34.9	-37.2

Notes:
(1) Noise measurement locations are shown in Exhibit 3.
(2) Construction noise calculations available in Appendix C of the noise impact analysis.
(3) Mitigation of 10 dBA can be achieved through use of mufflers and/or temporary sound barriers.

Operational Impacts

The build out of the proposed Project will result in impacts to its surroundings, primarily associated with traffic noise. In order to evaluate the impacts of the Project, the Federal Highway Administration (FHWA) Traffic Noise Prediction Model (FHWA-RD-77-108), as modified for CNEL and the "Calveno" energy curves, was used, based on the traffic to be generated by the Project (please see Section 2.18). As shown in **Table 2.14-7** below, the proposed Project will increase noise levels on surrounding streets by 0.0 to 0.2 dB. As described above, this increase will not be perceptible, and the impact of Project traffic on the surrounding noise environment will be less than significant.

Table 2.14-7
Project Traffic Noise Contributions to Buildout (2022) Scenario

Road Segments	Opening Year (2022) without Project		Opening Year (2022) with Project			Is the Increase Significant?
	ADT	dB CNEL	ADT	Total	Project-Specific Increase	
North/South						
Jefferson Street						
n/o Avenue 48	23,400	71.4	23,500	71.4	0.0	**No**
n/o Avenue 49	31,300	72.7	31,600	72.7	0.0	**No**
s/o Avenue 49	29,200	72.4	29,500	72.4	0.0	**No**
s/o Avenue 50	19,300	70.6	19,400	70.6	0.0	**No**
Verano Drive						
s/o Avenue 50	900	57.2	900	57.2	0.0	**No**
Madison Street						
n/o Avenue 49	9,000	67.2	9,000	67.2	0.0	**No**
s/o Avenue 49	8,600	67.0	8,600	67.0	0.0	**No**
s/o Avenue 50	8,100	66.8	8,100	66.8	0.0	**No**
Hjorth Street						
s/o Avenue 49	500	54.7	500	54.7	0.0	**No**
Monroe Street						
n/o Avenue 50	12,100	68.5	12,300	68.6	0.1	**No**
s/o Avenue 50	9,800	67.6	9,800	67.6	0.0	**No**
East/West						
Avenue 48						
w/o Jefferson Street	17,300	70.1	17,400	70.1	0.0	**No**
e/o Jefferson Street	18,400	70.3	18,400	70.3	0.0	**No**
Avenue 49						
w/o Jefferson Street	1,000	57.7	1,000	57.7	0.0	**No**
e/o Jefferson Street	4,300	64.0	4,300	64.0	0.0	**No**
w/o Madison Street	3,300	62.9	3,300	62.9	0.0	**No**
e/o Madison Street	3,200	62.8	3,200	62.8	0.0	**No**

Table 2.14-7
Project Traffic Noise Contributions to Buildout (2022) Scenario

Road Segments	Opening Year (2022) without Project		Opening Year (2022) with Project			Is the Increase Significant?
	ADT	dB CNEL	ADT	Total	Project-Specific Increase	
Avenue 50						
w/o Jefferson Street	9,000	67.2	9,100	67.3	0.1	**No**
e/o Jefferson Street	11,900	68.5	12,400	68.6	0.1	**No**
w/o Madison Street	11,300	68.2	11,800	68.4	0.2	**No**
e/o Madison Street	9,700	67.6	10,100	67.7	0.1	**No**
e/o Hjorth Street	9,900	67.7	10,300	67.8	0.1	**No**
e/o Monroe Street	12,700	68.7	12,800	68.8	0.1	**No**

*The uniform distance of 50 feet from centerline allows for direct comparisons of potential increases or decreases in noise levels based upon various traffic scenarios; however, at this distance, no specific noise standard necessarily applies.

Noise levels on the Project site will increase following build out of the proposed Project, due to the daily activities of the residents. These activities, however, are not expected to be any different than the activities currently occurring on surrounding built properties, and will include vehicle noise from residents entering and leaving the Project, back yard and common area play, barking dogs and landscaping equipment. None of these activities would be expected to generate a level of noise that would exceed the City's 60 dBA CNEL noise standard for residential uses, particularly given that existing noise levels at adjacent existing built properties, as shown in Table 12.14-??, Existing Noise Level Measurements, show low noise levels emanating from surrounding land uses. Impacts associated with on-site noise levels are expected to remain less than significant.

b) Generation of excessive groundborne vibration or groundborne noise levels;

General Plan Amendment

As is the case with construction noise, the GPU EIR found that the preparation of project-specific noise studies, consistent with Implementation Action 5, would be required for assessment of all development projects under the General Plan. The General Plan Amendment would not change this requirement. Further, the proposed GPA would result in the same land use as that allowed under the current Desert Estates Neighborhood designation, which is limited to single family homes and agriculture. Although the use of agricultural equipment could result in groundborne vibration, the proposed Transitional Neighborhood designation would not permit agricultural land uses, and would therefore reduce potential vibration impacts associated with the use of agricultural equipment.

The GPU EIR found that the impacts associated with typical construction activities almost never are sufficient to cause damage to buildings, unless pile driving or blasting is involved. The construction activities associated with the proposed General Plan Amendment will require neither pile driving nor blasting. The GPU EIR further found that the impacts associated with vibration due to construction of new projects leading to the build out of the General Plan would be less than significant, due to the requirement for the preparation of noise studies. As would be the case under the current land use designation, the proposed GPA would also require that development proposals prepare noise studies. Therefore, the impacts associated with vibration would be less than significant for the General Plan Amendment.

VENTANA Specific Plan
The noise impact analysis considered the potential impacts of construction activities from vibration using the Caltrans standard of 0.2 inches-per-second peak particle velocity (PPV) for both building damage and annoyance of nearby sensitive receptors. The City does not have a threshold for vibration impacts.

The highest degree of groundborne vibration would be generated during the paving phase of construction, due to the operation of a vibratory roller. Vibration velocities from vibratory roller operations are estimated to be approximately 0.1980 inch-per-second PPV at 26 feet from the source of activity.[5] Therefore, structures located more than 26 feet from vibratory roller operations would not experience groundborne vibration above the Caltrans significance threshold of0.2 inch-per-second PPV. The nearest existing structures from the Project site are located approximately 50 feet from any location within the project boundary where a vibratory roller may be used for the paving of Project roadways. Therefore, the Caltrans significance thresholds would not be exceeded, and impacts associated with vibration as they relate to adjacent sensitive receptors would be less than significant.

2.14.7 Mitigation Measures

As described above, the construction activities associated with the proposed Project could result in high noise and vibration levels. In order to reduce construction impacts to less than significant levels, the following Best Management Practices shall be implemented.

NOI-1 The following Best Management Practices shall be implemented during construction activities on the Project site:

a. During all project site excavation and grading on-site, construction contractors shall equip all construction equipment, fixed or mobile, with properly operating and maintained mufflers, consistent with manufacturer standards.

[5] Federal Transit Administration, *Transit Noise and Vibration Impact Assessment Manual*, September 2018.

b. The contractor shall place all stationary construction equipment so that emitted noise is directed away from the noise sensitive receptors nearest the project site.

c. Equipment shall be shut off and not left to idle when not in use.

d. The contractor shall locate equipment staging in areas that will create the greatest distance between construction-related noise/vibration sources and sensitive receptors nearest the project site during all project construction.

e. The project proponent shall mandate that the construction contractor prohibit the use of music or sound amplification on the project site during construction.

f. The construction contractor shall limit haul truck deliveries to the same hours specified for construction equipment.

g. Limit the use of heavy equipment or vibratory rollers and soil compressors along the project boundaries to the greatest degree possible. It is acknowledged that some soil compression may be necessary along the project boundaries.

h. Jackhammers, pneumatic equipment and all other portable stationary noise sources shall be shielded and noise shall be directed away from sensitive receptors.

i. For the duration of construction activities, the construction manager shall serve as the contact person should noise levels become disruptive to local residents. A sign should be posted at the project site with the contact phone number.

2.14.8 Significance After Mitigation

As described above, impacts relating to noise will be less than significant, with the exception of the construction activities associated with the Project. With the implementation of Mitigation Measure NOI-1, impacts associated with Project construction will be less than significant.

2.14.9 Cumulative Impacts

General Plan Amendment

The GPU EIR identified that a cumulative impact would occur if the growth enabled by the General Plan, combined with the development of lands surrounding the Planning Area in the cities of Coachella, Palm Desert, La Quinta, Indian Wells and the County of Riverside would significantly impact the noise environment. The GPU EIR determined that the build out of the General Plan would have less than significant noise impacts because of the policies and implementation actions required in the General Plan, and that the jurisdictions surrounding the City have similar policies and requirements that govern construction and operational noise

levels. The GPU EIR found, however, that the requirement that roadways be paved with noise-reducing paving materials could result in significant impacts until all roadways are repaved. This uncertainty, therefore, was found to have the potential to result in cumulative noise impacts.

The proposed General Plan Amendment would result in 91 more housing units than the current land use designation, and these residential units would generate more traffic than the current land use designation's traffic. Therefore, the increased traffic from the General Plan Amendment, combined with other traffic at General Plan build out, could result in higher noise levels. It is important to note that if the General Plan Amendment is implemented, it would require that any project on the subject property widen Avenue 50, and do so using noise-reducing paving materials. In order to determine whether the implementation of the GPA would have a significant impact on noise levels, the noise impact analysis included a Year 2040 scenario. As shown in **Table 2.14-8** below, the addition of 91 housing units to the traffic on surrounding streets will increase noise levels by 0.0 to 0.5 dB. This increase is imperceptible, and impacts associated with the implementation of the GPA would have less than significant cumulative impacts on the build out noise environment.

Table 2.14-8
General Plan Amendment Noise Contributions to 2040 Scenario

Road Segments	Year 2040 without Project		Year 2040 with Maximum Density Project			Is the Increase Significant?
	ADT	dB CNEL	ADT	Total	Project-Specific Increase	
North/South						
Jefferson Street						
n/o Avenue 48	31,700	72.7	31,900	72.7	0.0	**No**
n/o Avenue 49	42,400	74.0	42,800	74.0	0.0	**No**
s/o Avenue 49	39,500	73.7	39,900	73.7	0.0	**No**
s/o Avenue 50	26,200	71.9	26,300	71.9	0.0	**No**
Verano Drive						
s/o Avenue 50	1,200	58.5	1,200	58.5	0.0	**No**
Madison Street						
n/o Avenue 49	12,200	68.6	12,300	68.6	0.0	**No**
s/o Avenue 49	11,600	68.3	11,700	68.4	0.1	**No**
s/o Avenue 50	11,000	68.1	11,000	68.1	0.0	**No**
Hjorth Street						
s/o Avenue 49	700	56.2	800	56.7	0.5	**No**
Monroe Street						
n/o Avenue 50	16,300	69.8	16,600	69.9	0.1	**No**
s/o Avenue 50	13,200	68.9	13,300	68.9	0.0	**No**
East/West						
Avenue 48						
w/o Jefferson Street	23,500	71.4	23,600	71.4	0.0	**No**
e/o Jefferson Street	25,000	71.7	25,100	71.7	0.0	**No**

Table 2.14-8
General Plan Amendment Noise Contributions to 2040 Scenario

Road Segments	Year 2040 without Project		Year 2040 with Maximum Density Project			Is the Increase Significant?
	ADT	dB CNEL	ADT	Total	Project-Specific Increase	
Avenue 49						
w/o Jefferson Street	1,300	58.8	1,300	58.8	0.0	**No**
e/o Jefferson Street	5,800	65.3	5,800	65.3	0.0	**No**
w/o Madison Street	4,500	64.2	4,500	64.2	0.0	**No**
e/o Madison Street	4,300	64.0	4,300	64.0	0.0	**No**
Avenue 50						
w/o Jefferson Street	12,200	68.6	12,300	68.6	0.0	**No**
e/o Jefferson Street	16,000	69.7	16,600	69.9	0.2	**No**
w/o Madison Street	15,300	69.5	15,900	69.7	0.2	**No**
e/o Madison Street	13,100	68.9	13,700	69.1	0.2	**No**
e/o Hjorth Street	13,400	69.0	13,900	69.1	0.1	**No**
e/o Monroe Street	17,200	70.1	17,400	70.1	0.0	**No**

*The uniform distance of 50 feet from centerline allows for direct comparisons of potential increases or decreases in noise levels based upon various traffic scenarios; however, at this distance, no specific noise standard necessarily applies

VENTANA Specific Plan

At build out of the General Plan, implementation of the proposed Project would result in 58 more housing units than were originally considered for the Project site in the General Plan. These units will generate traffic, which will result in noise on surrounding streets. The noise analysis included the calculation of the addition of Project traffic to the roadway network, to determine whether the proposed Project would have long term, cumulative impacts on the noise environment. As shown in **Table 2.14-9**, although the Project would increase traffic noise on surrounding streets, the increase would range from 0.0 to 0.2 dB, which is imperceptible. Cumulative impacts associated with build out of the General Plan with Project conditions, therefore, will be less than significant.

Table 2.14-9
Project Traffic Noise Contributions to 2040 Scenario

Road Segments	Year 2040 without Project		Year 2040 with Project			Is the Increase Significant?
	ADT	dB CNEL	ADT	Total	Project-Specific Increase	
North/South						
Jefferson Street						
n/o Avenue 48	31,700	72.7	31,800	72.7	0.0	**No**
n/o Avenue 49	42,400	74.0	42,700	74.0	0.0	**No**
s/o Avenue 49	39,500	73.7	39,800	73.7	0.0	**No**
s/o Avenue 50	26,200	71.9	26,300	71.9	0.0	**No**
Verano Drive						
s/o Avenue 50	1,200	58.5	1,200	58.5	0.0	**No**
Madison Street						
n/o Avenue 49	12,200	68.6	12,200	68.6	0.0	**No**
s/o Avenue 49	11,600	68.3	11,600	68.3	0.0	**No**
s/o Avenue 50	11,000	68.1	11,000	68.1	0.0	**No**
Hjorth Street						
s/o Avenue 49	700	56.2	700	56.2	0.0	**No**
Monroe Street						
n/o Avenue 50	16,300	69.8	16,500	69.9	0.1	**No**
s/o Avenue 50	13,200	68.9	13,200	68.9	0.0	**No**
East/West						
Avenue 48						
w/o Jefferson Street	23,500	71.4	23,600	71.4	0.0	**No**
e/o Jefferson Street	25,000	71.7	25,000	71.7	0.0	**No**
Avenue 49						
w/o Jefferson Street	1,300	58.8	1,300	58.8	0.0	**No**
e/o Jefferson Street	5,800	65.3	5,800	65.3	0.0	**No**
w/o Madison Street	4,500	64.2	4,500	64.2	0.0	**No**
e/o Madison Street	4,300	64.0	4,300	64.0	0.0	**No**
Avenue 50						
w/o Jefferson Street	12,200	68.6	12,300	68.6	0.0	**No**
e/o Jefferson Street	16,000	69.7	16,500	69.9	0.2	**No**
w/o Madison Street	15,300	69.5	15,800	69.7	0.2	**No**
e/o Madison Street	13,100	68.9	13,500	69.0	0.1	**No**
e/o Hjorth Street	13,400	69.0	13,800	69.1	0.1	**No**
e/o Monroe Street	17,200	70.1	17,300	70.1	0.0	**No**

*The uniform distance of 50 feet from centerline allows for direct comparisons of potential increases or decreases in noise levels based upon various traffic scenarios; however, at this distance, no specific noise standard necessarily applies.

2.15 Population and Housing

2.15.1 Introduction

This section of the EIR describes existing population, housing, and socio-economic conditions in the Project area, as well as issues associated with environmental justice. It analyzes the potential impacts of the proposed Project on those resources, including changes in population and the demand for housing. The analysis is based, in part, on data and information from a variety of sources and agencies including the City of Indio General Plan and EIR.

2.15.2 Thresholds of Significance

Population and Housing
Project impacts to population and housing are analyzed using the thresholds of significance provided in Appendix G of the CEQA Guidelines. Appendix G uses the following questions to evaluate the project's potential impacts.

Would the project:

a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

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

The Initial Study determined that the Project would result in "No Impact' for threshold question b) above. Therefore, it is not analyzed further in this EIR.

2.15.3 Regulatory Framework

Population and Housing

Federal

No federal regulations related to population or housing would be applicable to the proposed Project.

State

No state regulations related to population or housing would be applicable to the proposed Project.

Regional/Local

Regional Transportation Plan/Sustainable Communities Strategy

The Southern California Association of Governments (SCAG) adopted the "2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS)" in 2020. The RTP/SCS is a long-range plan that coordinates regional land use and transportation strategies and strives for environmental sustainability, increased transportation capacity, response to demographic and housing market changes, and support of economic growth. It includes regional population, household, and employment growth forecasts and sets forth strategies and policies to balance future mobility and housing needs with projected population growth.

City of Indio General Plan

The City of Indio 2014-2021 Housing Element and General Plan (2019 Update) Chapter 3, Land Use and Urban Design, describe existing housing characteristics and future housing needs and strategies, and set forth the City's long-term residential goals, policies, and programs. Goals include a wide variety of housing types that are safe and healthy to serve a broad and diverse community.

As discussed in the Housing Element, SCAG generates and periodically updates the Regional Housing Needs Allocation (RHNA) for Indio, which is the minimum number of housing units necessary to accommodate population growth for all income levels in the City. The 2014-2021 Housing Element demonstrates that the current RHNA listed below could be accommodated in the City during the seven-year RHNA cycle from 2014 to 2021. The RHNA for Indio indicates that the City must be able to accommodate a total of 3,025 new dwelling units distributed by income category as follows:

- Extremely Low/Very Low-Income (up to 50 percent of Average Median Income [AMI]): 714 units (23.6 percent)
- Low-Income (51 to 80 percent of AMI): 487 units (16.5 percent)
- Moderate-Income (81 to 120 percent of AMI): 553 Units (18.4 percent)
- Above Moderate-Income (more than 120 percent of AMI): 1,271 units (41.5 percent)

The following General Plan goals apply to the quality of life envisioned for the City's population.

Goal HE-2 **Healthy Neighborhood Design.** Neighborhoods designed to encourage a healthy lifestyle for people of all ages, income levels, and cultural backgrounds.

Goal HE-3 **Environmental Quality.** A City designed to improve the quality of the built and natural environments to reduce disparate health and environmental impacts.

Goal HE-5 **Safety.** Neighborhoods that enhance the safety and welfare of all residents, employers, and tourists in the City of Indio.

2.15.4 Environmental Setting

Population

City and County population data are shown in Table 2.15-1. The Indio population increased 55.8% between 2000 and 2010, from 49,116 to 76,512. The latest (2020) population estimate is 90,751. SCAG projects the City's population will grow to 129,300 by 2045.

The population of Riverside County increased 41.17% between 2000 and 2010, from nearly 1.55 million to almost 2.19 million. The latest (2020) population estimate is over 2.44 million. It is projected to grow to 3.25 million by 2045.

Table 2.15-1
Regional Population Trends

	2000	2010	2020	2045 Forecast
Indio	49,116	76,512	90,751	129,300
Riverside County	1,545,387	2,189,641	2,442,304	3,252,000

Sources:
2000 and 2010: U.S. Census
2020: Report E5: City/County Population and Housing Estimates, January 1, 2020, CA Dept. of Finance.
2045 Forecast: Tables 13 and 14, Current Context Demographics and Growth Forecast Technical Report, 2020-2045 RTP/SCS, adopted on September 3, 2020, Southern California Association of Governments.

Housing

Local housing products include a mix of single- and multi-family units and mobile homes. In 2020, there were 32,539 housing units in Indio (Table 2.15-2). The majority (68.3%) were single-family detached units. The vacancy rate was 16.6% (Table 2.15-3). The vacancy rate is relatively low compared to other cities in the Coachella Valley, which are generally more influenced by the valley's tourism industry and warm climate that attracts seasonal residents. The City has an average of 3.31 persons per household.

Table 2.15-2
Indio Housing Characteristics

Unit Type	Number of Units	% of Total Units
Single-family detached	22,216	68.3%
Single-family attached	1,344	4.1%
Multi-family, 2-4 units	2,192	6.7%
Multi-family 5+ units	3,591	11.0%
Mobile homes	3,196	9.8%
Total:	32,539	100.0%

Source: Report E-5: City/County Population and Housing Estimates, January 1, 2020, California Department of Finance.

Table 2.15-3
Indio Housing Tenure

	Number of Units	% of Total Units
Occupied Units	27,136	83.4%
Vacant Units	5,403	16.6%
Total:	32,539	100.0%
Average persons per household: 3.31		

Source: Report E-5: City/County Population and Housing Estimates, January 1, 2020, California Department of Finance.

In 2020, the median price of existing homes was $361,159, and the median price of new homes was $412,318 in Indio.[1]

2.15.5 Existing Conditions

The Project site is currently vacant and was previously cultivated agricultural land between around 1953 and 2016. There is no population, housing, or employment onsite. No disadvantaged communities are located on the Project site or its immediate vicinity.

2.15.6 Project Impacts

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)?

General Plan Amendment

Population and Housing
The General Plan Amendment (GPA) proposes to change the Project site's General Plan designation from Desert Estates Neighborhood (up to 1 DU/AC) to a new land use designation, Transitional Neighborhood (up to 3 DU/AC). The GPA would allow up to 136 single-family detached dwelling units on the Project site at buildout, an increase of 91 units compared to the current designation. Based on an average household size of 3.31 persons, buildout of the GPA at the maximum density permitted could result in 302 more residents than buildout of the current General Plan.[2]

According to the GPU EIR, buildout of the General Plan would result in a projected population of 119,951 by 2040. This projection assumed the Project site would develop at Desert Estates Neighborhood densities. With implementation of the proposed GPA, the buildout population

[1] "Inland Empire Quarterly Economic Report: Inland Empire City Profile 2020," Year 32, Economics & Politics, Inc., October 2020. Data are from the 3rd quarter 2020.
[2] Report E-5: City/County Population and Housing Estimates, January 1, 2020, California Department of Finance.

could increase by 302 residents for a total buildout population of 120,253, which still represents less than the 2040 population projection of 123,300 developed by SCAG.[3] Build out of the GPA would bring General Plan build out marginally closer to consistency with SCAG forecasts. The direct growth impacts of the proposed GPA are within regional forecasts and, therefore, impacts will be less than significant.

The GPU EIR stated that residential and mixed-use land use designations in the GPU provide adequate housing capacity to accommodate population growth and meet the City's RHNA of 3,025 additional residential units for SCAG's Fifth RHNA Cycle (2014–2021). The addition of 91 units allowed by the GPA would have a beneficial impact on the City housing supply and would not adversely impact the City's ability to meet its RHNA requirements.

The GPU EIR determined that the total number of housing units would meet housing demand generated by new employees at buildout of the General Plan (2040). The proposed GPA would allow an additional 91 units on the Project site which would generate marginal increases in employment during both construction and operation, such as construction, landscaping, and home repair/maintenance jobs.

According to the GPU EIR, the City is not expected to experience indirect growth inducement beyond the growth forecast for the GPU through infrastructure improvements, as the City is already served by essential public services. Because future roadway system improvements identified in the GPU are intended to accommodate future population growth, roadway system improvements would not induce additional development that would increase population. The Project site is accessed by existing streets, and utilities and public facilities are available in the immediate area. The GPA would not result in the need for new infrastructure or roads, as they already occur adjacent to the site. Therefore, potential impacts of the GPA on indirect growth inducement would be less than significant and consistent with the current General Plan.

VENTANA Specific Plan

Population and Housing

The VENTANA Specific Plan proposes a low-density residential development consisting of 103 single-family detached residential units, a dog park, pedestrian trails, and open space common areas. Based on an average household size of 3.31 persons, build out of the Specific Plan could result in a population of 341.[4] This represents 0.26% of Indio's projected 2045 population of 129,300. The increase will not represent substantial population growth in the area, and the proposed residential units would accommodate the new population anticipated in growth forecasts.

[3] Table 11, Demographics & Growth Forecast Appendix, 2016-2040 RTP/SCS, Southern California Association of Governments, adopted April 2016.

[4] Report E-5: City/County Population and Housing Estimates, January 1, 2020, California Department of Finance.

The Project will generate new temporary construction jobs and long-term jobs associated with landscaping and property maintenance and repair. It is anticipated that most new jobs would be filled by existing local residents, and the demand for housing by people employed in conjunction with the Specific Plan, if any, would be very limited.

The Project site is located on existing streets, and utilities and public facilities are available in the immediate area. Buildout of the Specific Plan area would require parcel-level utility extensions and internal roads, but they would serve only the Project site and not induce population growth in the area. Impacts will be less than significant.

2.15.7 Mitigation Measures

Impacts would be less than significant, and no mitigation measures would be required.

2.15.8 Significance After Mitigation

Impacts would be less than significant.

2.15.9 Cumulative Impacts

According to the General Plan Update EIR, the GPU's contribution to cumulative impacts related to population growth would not be considerable. The GPU would not displace a substantial number of people or housing because growth facilitated by the GPU would result in an increase in housing units that would accommodate projected population growth. Thus, the GPU would not contribute to any cumulative impacts related to displacement of people or housing.

Both the GPA and the Project would have a less than significant cumulative impact on regional population and housing. The VENTANA Specific Plan proposes 103 residential units and amenities, which will not represent substantial population growth in the area and would accommodate the population anticipated in growth forecasts. When considered in conjunction with other existing, proposed, and approved development projects in the area, the incremental impact of the Project would be less than significant.

The Project and the GPA would have no cumulative impact on environmental justice because no disadvantaged communities are located in the Project vicinity; the nearest is approximately 2.4 miles away. The Project will provide a quality living environment for new residents and will not result in disproportionally negative impacts on disadvantaged communities in the City and surrounding area.

2.16 Public Services

2.16.1 Introduction

The following section describes the existing public services in the Project vicinity and analyzes the potential impacts associated with the proposed General Plan Amendment and VENTANA Specific Plan Project. A variety of local and regional data and information, ranging from research and analysis conducted for the Project site, to regional-scale planning and environmental documents, have been used in researching and analyzing the Project and its potential effects on public services.

2.16.2 Thresholds of Significance

Potential impacts to public services are analyzed using the thresholds of significance provided in Appendix G of the CEQA Guidelines. Appendix G uses the following questions to evaluate the Project's potential impacts.

Would the project:

a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

- Fire Protection?
- Police Protection?
- Schools?
- Parks? (see Section 2.17, Parks and Recreation)
- Other Public Facilities?

2.16.3 Regulatory Framework

Federal

There are no federal regulations governing public services that apply to the proposed Project.

State

There are no state regulations governing public services that apply to the proposed Project.

Regional and Local

City of Indio General Plan

The City of Indio General Plan 2040 provides the following public services policies that are applicable to the Project:

Policy SE-1.4 Crime Prevention Through Environmental Design. Promote Crime Prevention Through Environmental Design (CPTED) concepts, including, but not limited to:

- Controlling access by creating real and perceptual barriers to entry and movement through the use of fences or landscaping to define site boundaries, clearly defined pathways to guide movement, gates or doors to limit access, and signs to define appropriate activities.
- Maximizing opportunities to see and be seen through the use of lighting, windows, building orientation and location, proper selection of landscaping materials and regular maintenance, furniture arrangements, surveillance equipment, or other security or design measures.
- Clearly defining ownership and encouraging maintenance of properties through measures such as landscaping, front porches, fencing, variations in paving materials, or other elements to distinguish between private and public spaces. Display signs to establish ownership and keep buildings, yards, gardens, sidewalks, and other features well maintained, clean, and in working order.

Policy SE-3.2 Water Service and Pressure. Ensure that sufficient water service and pressure is available throughout the City for firefighting purposes, including continuing to require new development to provide necessary water mains, fire hydrants, and access for emergency vehicles and personnel.

Policy SE-3.8 Development Applications. Continue to review development applications for consistency with applicable fire and building code regulations, including emergency access/evacuation routes.

Policy LU-12.3 Fair Share. Require new development to pay their fair share for required improvements to public services and infrastructure.

Policy LU-12.4 Actual Costs. Ensure that development impact fees are updated often and reflect the actual costs of improvements.

2.16.4 Environmental Setting

Fire protection and emergency medical services to the City of Indio are provided by the Indio Fire Department. In addition, a full range of fire services are provided in the City as part of a regional fire protection system through a cooperative agreement with the Riverside County Fire Department.

Police protection in Indio is provided by the Indio Police Department. The Eastern Riverside County Interoperable Communications Authority is a Joint Powers Authority formed between the Cities of Indio, Desert Hot Springs, Palm Springs, Cathedral City, and Beaumont. The Authority was formed as a legal entity intended to serve and ensure safety throughout the Coachella Valley by bringing radio regional interoperability to first responders to address crime incidents and manmade or natural disasters in the region.[1]

Indio receives educational services from two K-12 public school districts: Desert Sands Unified School District (DSUSD) and Coachella Valley Unified School District (CVUSD). The City also includes a community college campus.

The City owns and maintains 16 parks, and the Desert Recreation District operates the Indio Community Center and Park. These facilities and the Project's potential impacts on them are described in Section 2.17, Parks and Recreation, of this EIR, and are not discussed further in this section.

Other public facilities include City Hall, Indio Public Library, John F. Kennedy Memorial Hospital, Indio Community Center, and Indio Teen Center. These and the above-described services and facilities are described in detail below.

2.16.5 Existing Conditions

Fire Protection

The City prioritizes public safety and provides a full-service fire department equipped with 56 full-time staff. The Indio Fire Department operates four active fire stations located throughout the City to provide timely response and services. Station 3 covers West Indio and is located at 46621 Madison Street, approximately 1.37 miles northeast of the Project site. Eleven firefighters are assigned to the station, which is equipped with one fire engine and one paramedic ambulance. Station 1, located at 46900 Jackson Street in southeast Indio and approximately 2.59 miles northeast of the Project site, serves as the City's Headquarters Station where Fire Administration and Prevention Offices are located. There are 22 firefighters assigned to the station that staff one fire engine, one ladder truck, and one paramedic ambulance. Additional equipment includes one reserve fire engine, one reserve ambulance, and one water tender.[2]

The City's Fire Services Prevention Office adopts and enforces fire policies and codes relative to public safety issues, engages in community outreach, and administers education programs that increase public awareness. The Fire Marshal is responsible for the Fire Department's Fire Prevention Office. The prevention office consists of the Fire Marshal, two Fire Safety Specialists, two Fire Safety Inspectors, and one Office Assistant. Specifically for residential development,

[1] City of Indio GPU EIR Page 4.14-4.
[2] City of Indio GPU EIR Page 4.14-1.

the Fire Prevention staff ensures that public safety is maintained by: adopting and enforcing codes and ordinances relative to fire and life safety Issues; working with developers and City planning departments on development projects impacting fire protection services, from conception through planning process approval; conducting new construction inspections and fire safety inspections, and enforcing applicable fire codes and ordinances; and interacting with developers, architects, and engineers to meet the fire protection requirements for buildings and developments by reviewing all architectural blue prints, development plans, and proposals submitted in the City of Indio.[3]

Emergency Medical Services

The Indio Fire Department provides emergency medical services and advanced life support services with City Fire ambulances. Three hospitals can provide care and personnel in the event of an emergency in the Coachella Valley, including:

Desert Regional Medical Center
1150 N Indian Canyon Drive
Palm Springs, CA 92262
(approximately 19.42 miles northwest of the Project site)

Eisenhower Medical Center
39000 Bob Hope Drive
Rancho Mirage, CA 92270
(approximately 10 miles northwest of the Project site)

John F. Kennedy Memorial Hospital
47111 Monroe St
Indio, CA 92201
(approximately 1.58 miles northeast of the Project site)

Police Protection

The Indio Police Department enforces local, state, and federal statutes to protect the general welfare of the community. The Chief of Police and three Divisions (Field Services, Investigative Services, and Support Services) in the department administer enforcement. The police department uses multiple strategies to address crime, including a K-9 program, dispatch, neighborhood watch programs, community outreach, and a Citizens Online Police reporting system.[4]

The Indio Police Department is located at 46800 Jackson Street, approximately 2.62 miles northeast of the Project site. It currently consists of 62 sworn officers and 37 non-sworn staff for a total of 99 full-time staff. The Police Department currently participates in the California

[3] City of Indio GPU EIR Page 4.14-2.
[4] Ibid.

Law Enforcement Mutual Aid System, which is used to restore order during emergencies and provide assistance to local agencies during other unusual events. Response times within the City vary, depending on the location of the patrol car.

Schools

Two public school districts, Desert Sands Unified School District (DSUSD) and Coachella Valley Unified School District (CVUSD), serve the City of Indio. DSUSD consists of 18 elementary schools, one charter elementary school, six middle schools, one charter middle school, four comprehensive high schools, two continuation high schools, one alternative education school, and one preschool.[5] CVUSD consists of fourteen elementary schools, three middle schools, three comprehensive high schools, one continuation high school, and one adult school.[6] The Project site is within the CVUSD boundaries.[7] The nearest school is Mountain Vista Elementary School, located approximately a half mile east of the Project site.

The College of the Desert (COD) Indio Campus is located approximately 2.78 miles northwest of the Project site. COD is a community college that opened in September 1962. The COD main campus is located on Monterey Avenue in Palm Desert; it offers two-year college programs and has an average enrollment of 10,000 students per semester. COD offers a wide range of vocational and technical programs, including nursing and health sciences, digital design and production, turf grass management and ornamental horticulture, advanced transportation technologies, and a full range of administration of justice courses. The COD Indio Campus offers general education credit classes, basic skills courses, and day and evening English courses.

Several undergraduate and graduate schools are located in the nearby City of Palm Desert, including College of the Desert (COD) Palm Desert Campus, University of California-Riverside/Palm Desert (UCR Palm Desert), and California State University - San Bernardino Palm Desert Campus (CSUSB Palm Desert).

UCR Palm Desert is an extension of University of California-Riverside (UCR); it opened in 2005. UCR Palm Desert's campus is located on Cook Street and offers a number of bachelor's and graduate programs. CSUSB Palm Desert is an extension of California State University - San Bernardino; it opened in 2012. CSUSB Palm Desert is located on Cook Street just south of Interstate-10 and offers several academic programs, including bachelor's and graduate degree programs.

Other Public Facilities

Other public facilities in the City include City Hall, the public library, the community and teen centers, and medical/emergency facilities.

[5] Desert Sands Unified School District; https://www.dsusd.us, accessed January 2021.

[6] Coachella Valley Unified School District; https://www.cvusd.us, accessed January 2021.

[7] CVUSD School Site Locator; http://cvusdmtvista.sharpschool.net/cms/One.aspx?portalId=5154617&pageId=5386789, accessed January 2021.

Facility	Location	Distance to the Project Site
City Hall	100 Civic Center Mall	2.94 miles
Indio Public Library	200 Civic Center Mall	2.91 miles
John F. Kennedy Memorial Hospital	47111 Monroe Street	1.58 miles
Indio Community Center	45871 Clinton Street	1.91 miles
Indio Teen Center	81-678 Avenue 46	1.96 miles

2.16.6 Project Impacts

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 (see Section 2.17)***
- ***Other Public Facilities***

General Plan Amendment

Fire Protection

The City's General Plan Update EIR concluded that adherence to the goals and policies of the General Plan Update would ensure that impacts associated with the provision of new or physically altered fire facilities would be less than significant (Page 4.14-19). The proposed General Plan Amendment (GPA) will create a new residential designation, Transitional Neighborhood, allowing up to 3 DU/AC and changing the designation of the 45.17-acre Project site to Transitional Neighborhood. The GPA would increase the allowable density from 1 DU/AC of the current Desert Estates designation to 3 DU/AC under the Transitional Neighborhoods designation; however, the permitted land use (primarily low-density, single-family residential) would remain unchanged. At maximum buildout under the proposed Transitional Neighborhood designation, an additional 91 units could be developed on the Project site, potentially resulting in an increase of approximately 302 residents at build out (see Section 2.15, Population and Housing, of this EIR). The GPA would increase the demand for fire protection services; however, the increase would not be such that new or physically altered fire facilities would be required. Despite the increase in density, future development on the Project site under the new designation would still be subject to all GPU policies and programs and other standard requirements, as discussed below.

Policies SE-3.4, SE-3.7, and SE-3.8 (General Plan pages 10-19 and 10-20) require new development to use fire-resistant building materials, ensure response adequacy, and ensure development applications comply with requirements of the fire code and CBC. Goal SE-3.0 and Policies SE-3.1, SE-3.6, and SE-3.10 (General Plan pages 10-19 and 10-20) call for ensuring that fire-fighting and advanced life support infrastructure, equipment, and personnel are adequately provided and that a high level of fire and emergency medical services are available to support Indio's existing and future needs. Implementation of these goals and policies will assure that future development projects, including those developed according to the proposed GPA, have less than significant impacts on the City's ability to provide adequate fire protection services. Impacts of the GPA on fire protection services will be less than significant.

Police Protection

The GPU EIR concluded that adherence to GPU policies would reduce impacts associated with the provisions for additional police services as part of the GPU. The General Plan Safety Element includes goals and policies to ensure acceptable response times, police staffing levels, and environmentally sustainable infrastructure and facilities. Policy SE-1.1 (General Plan page 10-17) calls for maintaining adequate police protection capabilities by forecasting future demand and providing additional staff, law enforcement equipment and technology acquisition, and facilities when fiscally appropriate and needed. Policy LU-12.2 (General Plan page 3-58) requires the City to ensure adequate infrastructure and utility service levels before approving new development. Policy SE-1.4 (General Plan page 10-17) promotes Crime Prevention through Environmental Design (CPTED) concepts including access control, lighting and visibility, and property maintenance principles. Maximum buildout according to the new land use designation would result in an additional 91 units and potentially 302 additional residents on the Project site, and would increase the demand for police services compared to that analyzed in the GPU EIR. However, the increase would not be such that new or physically altered facilities would be required. The General Plan policies will continue to apply and reduce impacts associated with police services. Impacts of the GPA on police protection services will be less than significant.

Schools

According to the GPU EIR, DSUSD and CVUSD anticipate that new school construction would be required in order to accommodate additional future students within the City. DSUSD and CVUSD will continue to collect school impact fees from developers, and pursuant to SB 50 and AB 2926, these fees are considered to fully mitigate school capacity-related impacts. New development in the General Plan area would occur over time, and student populations are expected increase gradually. Both school districts have facility master plans that plan for new school sites as population within their respective boundaries increases. Future proposals for new school facilities in the City would be subject to case-by-case review, and compliance with federal, state, and local building codes and regulations would minimize potential environmental impacts.

The Project site is located in the CVUSD boundaries and, at maximum buildout, the GPA would facilitate an additional 91 households on the site than the current land use designation. Using the student generation rate of 0.6 student per household for CVUSD cited in the GPU EIR, the GPA would result in an additional 55 students, which represent an approximately 0.2% increase in the 22,886 new students projected for the City's school districts at General Plan buildout. Given the marginal increase in student generation as a result of the GPA, impacts on schools will remain less than significant as concluded in the GPU EIR. Based on State law, collection of state-mandated school impact fees on the Project site would reduce school-related impacts to a less than significant level under CEQA. Local school districts would develop and impose appropriate mitigation for environmental impacts associated with individual new schools as they are proposed and constructed. Impacts of the proposed GPA on school services would be less than significant.

Other Public Facilities

According to the GPU EIR, the GPU Infrastructure and Public Facilities Element and Land Use and Urban Design Element provide policies to ensure the development of necessary public facilities and services for the City at General Plan buildout. Under the City's Developer Impact Fee ordinance, each new residential unit must pay "Public Building Fees" to be used for public buildings, including additions to libraries. The County is responsible for new library facilities in the region, and the GPU policies and the City's Developer Impact Fee ordinance can aid the County in the planning and funding of future local libraries. Future library facilities in the Planning Area would be subject to review by the County, and adherence to federal, state, and local building codes and regulations would minimize impacts to the extent practicable. The GPU EIR concluded that impacts associated with the provision of new or physically altered library facilities would be less than significant. Because the proposed GPA would result in a limited increase in population of an estimated 302 residents at maximum buildout, and the GPU policies and developer impact fees would continue to apply to the Project site, impacts of the GPA on public facilities will be less than significant.

VENTANA Specific Plan

Fire Protection

Construction of the Project in accordance with the proposed VENTANA Specific Plan will result in a marginal potential increase in fire and medical response demand associated with construction activities and equipment. Potential ignition sources during construction could include chain saws, woodchippers, grinders, torches, earth-moving equipment, and other vehicles that could create sparks, generate heat, or leak flammable materials, that would increase the possibility of fire. However, the Fire Code requires that water connections be available prior to the initiation of construction, thereby minimizing potential fire risks. Potential risks will end once construction is complete.

Over the long term, operation of the proposed Project will increase the demand for fire services in the City due to 103 new residential units and a projected population of 341 residents (see Section 2.15, Population, Housing, and Socio-Economic Resources, of this EIR). The Project proponent will be required to pay the City's development impact fees for fire facilities and apparatus. This fee requires new development to pay its fair share of future facilities.

In accordance with standard City practices, the Fire Department would review project plans before permits are issued to ensure that adequate fire and safety measures are incorporated into the Project in compliance with all applicable state and city fire safety regulations. Emergency access will be provided to the site via the existing public roadway network (Avenue 50) and proposed onsite roads. The Fire Department has approved the Project's primary access as emergency access on the basis that both directions of travel on Verano (extended) will provide 24 feet of clearance, and can be used for entrance or egress under emergency conditions.

Because the proposed Project will be required to comply with City standards and is not anticipated to generate substantial additional demand for fire protection services, it would not result in the need for new or expanded facilities. Therefore, the Project's potential impact on fire protection services will be less than significant.

Police Protection

Construction of the Project per the proposed Specific Plan will result in a potential increase in the need for security to prevent theft or vandalism of construction activities and equipment. However, this potential impact will be minimized through compliance with standard safety measures, such as fencing and locking excavation, vehicle staging, and storage areas at the end of each workday, providing adequate nighttime lighting, minimizing "dead zones," and providing professional security personnel, if needed. With implementation of these measures, impacts associated with public safety during construction of the proposed Project will be reduced to less than significant levels.

During operation, the Project will result in a marginal increase in demand for police services for the protection of 103 residential units and an estimated 341 additional persons (if fully occupied). The Project vicinity is currently patrolled and will continue to be patrolled after Project development. Police personnel will be able to access the site using Avenue 50. The Project will be required to comply with all Police Department regulations and procedures. Both planning areas will have perimeter walls. Planning Area 2 will have gated access that will restrict access to this portion of the Project area. The Specific Plan includes additional Crime Prevention through Environmental Design (CPTED) concepts that are described in General Plan Policy SE-1.4 (see Section 2.16.3, above) and can be expected to help reduce the demand for police protection services. For example, Specific Plan page 29 addresses walls and fences for the community and individual homes, and pages 25 and 28 address lighting.

Therefore, the proposed Project is not expected to require construction of new or expanded police services or facilities; impacts on police protection services will be less than significant.

Schools

According to the CVUSD, the District has school capacity to house approximately 21,004 students.[8] Elementary school facilities are sufficient to house 12,216 students in kindergarten through sixth grade; middle school facilities are sufficient to house 2,828 students in seventh through eighth grade; and high school facilities are sufficient to house 5,960 students in ninth through twelfth grade. As of January 2020, approximately 17,495 students are enrolled in the CVUSD system, with excess capacity only at the elementary and high school levels. Furthermore, approximately 34,144 new dwelling units are anticipated to be constructed within the CVUSD jurisdictional boundaries by the year 2040.[9]

Buildout of the Project will result in 103 single-family residential units and a projected population of 341. Based on CVUSD student generation rates shown below, the Project has the potential to generate approximately 76 kindergarten through twelfth grade students. The potential student increase represents around 0.4% of CVUSD's current student body.

Table 2.16-1
Project Student Generation

School Type	Generation Rate (per residential unit)	Project's Student Generation
Elementary School	0.3974	41
Middle School	0.1207	13
High School	0.2058	22
Total:	----	76

Source: Coachella Valley Unified School District - Fee Justification Study for New Residential and Commercial/Industrial Development, Table VI District-Wide Student Generation Rate (May 2020) and Project materials.

The proposed Project will be subject to the CVUSD developer fees in place at the time development occurs, which currently stand at $4.08 per square foot on all new residential construction.[10] 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.

[8] Coachella Valley Unified School District - Fee Justification Study for New Residential and Commercial/Industrial Development, May 5, 2020.

[9] Ibid.

[10] School /Developer Fees, Coachella Valley Unified School District, effective 8/10/2020.

Other Public Facilities
Buildout of the Project will result in an additional 341 residents (assuming full occupancy) and thus a marginal increase in need for the local library and/or other public facilities. Under the City's Developer Impact Fees ordinance (Indio Municipal Code Section 33.065 et seq), each new unit must pay "Public Building Fees" to be used for public buildings, including additions to libraries. The use of public facilities by Project residents is not expected to require new or expanded facilities that could result in adverse environmental impacts. With the payment of applicable impact fees, Project-related impacts to public facilities will be less than significant.

2.16.7 Mitigation Measures

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

2.16.8 Significance After Mitigation

Project impacts to fire and police services, schools, and other public facilities would be less than significant. No mitigation is required.

2.16.9 Cumulative Impacts

The study area for the GPU EIR (page 5-18) assessment of cumulative impacts to public services was the applicable provider's service area. The GPU EIR determined that future development in the service area could result in cumulative impacts associated with additional demands for public services, resulting in the need for new or expanded facilities. However, policies in the General Plan would ensure that adequate public services and facilities must be provided prior to development (Policies PR-2.8: New Development, and LU-12.2: Adequate Infrastructure); therefore, the General Plan's incremental contribution to public services and facilities impacts would not be cumulatively considerable.

Compared to the GPU, the 91 units added by maximum buildout of the proposed GPA would result in a 0.2% increase in the number of dwelling units, while buildout of the 103 units of the Project would result in a 0.3% increase, but both would develop the same parcels and acreage as the current General Plan designation with land uses consistent with the current designation. The Project, therefore, would result in only a marginal increase in development that would not contribute considerably to cumulative impacts on public services in the service areas of the affected service providers. Impacts on each public service provider are discussed in detail below.

Police Protection
Implementation of the proposed Project in conjunction with other development projects in the area would increase the demand for police services. Over time, increases in population in the City have the potential to increase calls for police protection services. The Project alone would result in marginal increases in population and building square footage, and impacts would be

reduced by incorporating safety features and strategies into site planning and coordinating Project plans with the Police Department. The proposed Project's contribution would not be cumulatively considerable.

Fire Protection

Implementation of the proposed Project in conjunction with the other related projects in the area would increase the demand for fire protection services over time. The Project alone would result in marginal increases in population and building square footage; as discussed above, impacts would be less than significant with payment of fire facilities and equipment development impact fees, which will be applied to all future projects. The proposed Project's contribution would not be cumulatively considerable.

Schools

The proposed Project, in combination with other development projects in the Project vicinity, is expected to result in a cumulative increase in the demand for school services. As discussed above, as of 2020, the CVUSD is over its capacity for middle schools. The CVUSD has determined that approximately 10.71 additional elementary schools, 2.69 middle schools and 2.15 high schools will need to be constructed to provide adequate facilities in its service area in the future. The estimated costs of these school facilities, excluding interim housing and administrative facilities, is over $1,059 million dollars, which is the basis of the Fee Justification Study prepared by the District to establish school impact fee payments for developments.[11] Payment of school impact fees will help the CVUSD expand its facilities as needed. The proposed Project will generate a maximum of 76 new students, and its contribution to school impacts would not be cumulatively considerable.

Other Public Facilities

The proposed Project, in combination with other development projects in the Project vicinity, would be expected to increase the use of other public facilities in the Project area. Although the proposed Project would contribute to the cumulative demand for other public facilities, its contribution would be insignificant given the scale of the Project and the maximum 341 future resident population. The Project's cumulative impact would be less than significant with the payment of developer impact fees.

[11] Coachella Valley Unified School District - Fee Justification Study for New Residential and Commercial/Industrial Development, May 5, 2020.

2.17 Recreational Resources

2.17.1 Introduction

This section of the EIR describes and evaluates the potential impacts of the proposed VENTANA General Plan Amendment and Specific Plan Project to existing and future parks and recreation facilities. The potential for adverse impacts to recreational facilities were evaluated based on current facilities and existing usages of recreational parks and facilities in the City of Indio.

2.17.2 Thresholds of Significance

Based upon Appendix G of the CEQA Guidelines, the proposed VENTANA Project would significantly affect parks and recreational facilities if it would:

a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated.

b) Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.

2.17.3 Regulatory Framework

Federal

There are no federal regulations applicable to the proposed Project regarding parks and recreational facilities.

State

Quimby Act

California allows a city or county to pass an ordinance that requires, as a condition of approval of a subdivision, either the dedication of land, the payment of a fee in lieu of dedication, or a combination of both for park or recreational purposes (California Government Code, Section 66477). This legislation, commonly called the "Quimby Act," establishes a minimum parkland dedication standard of 3 acres of parkland per 1,000 residents for new subdivision development unless the amount of existing neighborhood and community parkland exceeds that limit.

Regional and Local

City of Indio Municipal Code

Section 156.130 of the Municipal Code establishes land dedication and development fees (in lieu) for parks and recreation. Specifically, Section 156.132 states:

> As a condition of approval of a tentative or final tract map or parcel map for a residential subdivision or a multiple family residential project, the subdivider/developer shall be required to dedicate land, pay a fee in lieu thereof, or both.

Further, Section 156.133 requires three acres of property for every 1,000 persons residing within the City be devoted to local and community park and recreational purposes, and that such park area is necessary to provide for the needs of the current and future persons residing and working in the City. This is based on a unit occupancy standard of 3.9 persons per single-family dwelling, 3.5 per multi-family unit, 1.5 per mobile home, and 1.8 per age-restricted unit.

As an alternative to dedication, developers can opt to pay an in lieu fee. The fee is calculated by multiplying the area of park to be dedicated by the fair market value of the land being developed, plus the development's fair-share contributions to cover the cost of park improvements. Developers are subject to consideration of a credit against park dedication requirements for land dedicated for park purposes, and for park and recreation improvements.

In order to address the demands of new development on public services and facilities, including parks and recreation within the City, the City of Indio City Council adopted Ordinance No. 1463 on May 17, 2006, which is codified in the Indio Municipal Code Section 33.065 et seq. The purpose of the Development Impact Fee (DIF) is to ensure that new development pays its fair share for services that are needed to meet demand. DIFs include park fees to be used for "improvements and facilities to park lands for recreation and leisure activities" (Section 33.068.B).

City of Indio General Plan

The City of Indio General Plan Land Use and Parks, Recreation and Open Space Elements include goals and policies to ensure that the City maintains existing parks and park facilities as well as provides additional park land to serve future population growth. Relevant goals and policies are as follows:

Goal PR-2 High-Quality Parks. High-quality parks and recreational facilities that promote community health and are safe and convenient to access.

Policy PR-2.1 Park Ratio. Work to achieve a ratio of 3 acres of public parks per 1,000 residents and place a park or recreation amenity within one-half mile of all Indio residents. Maintain adequate land dedication requirements and/or development fees for new development to meet the park ratio.

Policy PR-2.2 Parks Classification System. Utilize the parks classification system identified in the General Plan to help guide public park planning and improvements in the City.

Policy PR-2.8 New Development. Ensure that new residential developments provide adequate on-site recreational and open space amenities consistent with the values and standards of the community and the needs of new development. Require projects to establish mechanisms, such as a Community Facilities District, to adequately maintain new parks and recreational facilities.

Policy LU-12.2 Adequate Infrastructure. Ensure adequate infrastructure and utility service levels before approving new development.

2.17.4 Environmental Setting

Parks and recreational facilities provide residents, visitors and the community with both active and passive health and recreational benefits. The Coachella Valley and the broader region provides rich parks and recreational resources such as the Joshua Tree National Park, Mount San Jacinto State Park, and the Indian Canyons south of Palm Springs managed by the Agua Caliente Band of Cahuilla Indians. Each city in the Coachella Valley has its own parks and recreation facilities. Generally, parks are classified based on their sizes, as discussed below.

Standard Park Classifications

Parks and open space are an integral part of the urban landscape, providing natural spaces for passive enjoyment and ballfields and courts for a variety of games and active recreation. The following summarizes the range of typical park types, sizes, and facilities typically developed in the City of Indio.

Table 2.17-1
Standards for Park Areas

Type of Park	Size (acres)	Radius of Area Served	Acres/1,000 Population	Desirable Uses	Site Characteristics
Mini Park	Typically less than 1	0.25 miles	0.25	Playgrounds, green space, shelters, special purpose open space	Intended to serve population within walking or short biking distance
Neighborhood Park	5 to 10	1.5 miles	0.2	Picnicking, play area, athletic fields and courts	Primarily in residential areas and serve the surrounding neighborhood
Community Park	10 to 50	5 miles	5	Multipurpose building, athletic field and courts, picnicking, special uses and features	Designed to serve all city residents and even multiple cities

Sources: City of Indio General Plan, Chapter 7. Parks, Recreation, and Open Space, (September 2019); "Standards for Outdoor Recreational Areas" Planning Advisory Service, American Planning Association. 1965.

In addition to the City's own parks, Desert Recreation District (DRD) provides recreational services to more than 380,000 residents in communities from Rancho Mirage east to the Salton Sea. DRD is responsible for over 30 recreational facilities that include community and fitness centers, sports fields, swimming pools, a golf course and driving range, and various parks, and open spaces.

2.17.5 Existing Conditions

The City's Public Works Department, Parks & Facilities Division is responsible for maintaining parks while the Desert Recreation District (DRD) is responsible for providing recreational facilities.

The City has adopted a desired standard of a ratio of 3 acres of public parkland per 1,000 population. With an estimated current City population of 90,751,[1] and a total of 63 acres of existing parks (excluding golf courses), the current parks to population ratio is 0.69 acres per 1,000 residents. In addition to a municipal golf course and two dog parks, there are 14 existing City parks distributed throughout Indio. Each park provides a variety of amenities that encourage outdoor and family-oriented recreation. Table 2.17-1 identifies the public parks in Indio. In addition to these parks, the Desert Recreation District operates the Indio Community Center and Park. Currently, the City has no joint use recreational facilities. The City also contains approximately 2,478 acres of other open space, including the private Empire Polo Club grounds and other private recreational areas within planned developments, and other golf courses.

Table 2.17-2
City of Indio Parks and Recreation Facilities

Park Name	Size	Park Type	Amenities
Doug York Plaza	0.25 acre	Mini	Open turf and group shelter
Marshall Parkway	0.5 acre	Mini	Garden and playground equipment
Station 87 Dog Park	0.8 acres	Mini	Dog park with fenced dog run, separation for small and large dogs, benches, water and shade structure
Shields Park	1 acre	Mini	Loop walk and picnic grounds
Burr Street Park	2.5 acres	Mini	Basketball court, playground equipment, picnic grounds
Yucca Park	1 acre	Neighborhood	Water play, basketball courts, picnic grounds, playground equipment, and group shelter
Mulligan Dog Park	2 acres	Neighborhood	Dog park with fenced dog run and benches

[1] E-5 City/County Population and Housing Estimates, 1/1/2020, California Department of Finance.

Table 2.17-2
City of Indio Parks and Recreation Facilities

Park Name	Size	Park Type	Amenities
Dr. Carreon Park	2.4 acres	Neighborhood	Water play, basketball court, loop walk, open turf, playground equipment, public art, restrooms
Hjorth Street Park	3 acres	Neighborhood	Loop walk, open turf, picnic grounds
Dominguez Park	3.3 acres	Neighborhood	Water play, basketball court, loop walk, open turf, picnic grounds
Cahuilla Park	4 acres	Neighborhood	Water play, basketball court, open turf, picnic grounds, playground equipment, group shelter
George S. Patton Park	4.3 acres	Neighborhood	Basketball court, tennis court, open turf, playground equipment, restrooms, and group shelter
North Jackson Park and Rotary Field	4.5 acres	Community	Water play, softball fields, basketball court, racquetball, tennis court, concessions with restrooms, loop walk, picnic grounds, playground equipment, and group shelter
Miles Avenue Park	16 acres	Community	Water play, basketball court, open turf, picnic grounds, playground equipment, restroom, event space, and group shelter
South Jackson Park and Davis Field	17.5 acres	Community	Soccer field, racquetball, tennis courts, concessions with restrooms, open turf, picnic grounds, playground equipment, public art, event space, group shelter, and Pawley Pool Family Aquatic Complex with a lap pool, wading pool, and splash pad
Municipal Golf Course	46 acres	Special Use	Driving range, clubhouse/pro shop, putting green, 3 par course

There are pedestrian, equestrian, and bike trails throughout the City that tie residential neighborhoods together, provide access to open space, and serve as active recreational amenities. Existing pedestrian hiking trails are located generally northeast of Golf Center Parkway and along Avenue 38 adjacent to the Talavera/Andreas Ranch development. Major feeder and equestrian hiking trails extend from Jefferson Street to Madison Street and north of I-10 extending towards Avenue 36. Trunk equestrian hiking trails are primarily located north of I-10 in residential planned developments. Future segments of CV Link, an approved and partially constructed 40-mile regional multi-modal pathway, will be constructed generally along the banks of the Coachella Valley Stormwater Channel in Indio.

2.17.6 Project Impacts

a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated.

General Plan Amendment

According to the General Plan Update EIR analysis, as of 2018, the City is currently deficient in parkland acreage and would require a net increase of approximately 297 acres of parkland to be developed and maintained by the City to meet the standard of 3.0 acres per 1,000 residents. The City would need to work toward identifying future planned parks in conjunction with future development. As detailed in the GPU, the City has identified future park and trail improvement, expansion, and construction projects, including expansion of Dr. Carreon Park and a new neighborhood park located south of Avenue 49 and west of Monroe Street.

While there is currently a deficit with respect to meeting the 3.0 acres per 1,000 population standard, compliance with the goals, policies, and implementation actions set forth in the GPU and completion of the CV Link would improve park and recreation facilities to meet the demands associated with growth accommodated under the GPU. The GPU EIR concluded that with these planned improvements, forecast growth under the General Plan would not result in substantial physical deterioration of the park and recreational facilities. In addition, all new development must adhere to General Plan goals and policies and be required to provide parkland or in-lieu fees, as required by the Municipal Code.

The General Plan Amendment (GPA) proposes to change the Project site's General Plan designation from Desert Estates Neighborhood (up to 1 DU/AC) to a new land use designation, Transitional Neighborhood (up to 3 DU/AC). The GPA would allow up to 136 units on the Project site at buildout, an increase of 91 units compared to the current designation. Based on an average household size of 3.31 persons, buildout of the GPA could result in 302 residents more than buildout under the current General Plan designation.[2] This represents a marginal increase on usage of park and recreation facilities compared to that anticipated in the General Plan. Potential impacts would be reduced in several ways. Under the proposed designation, future projects on the site would still be required to provide parkland or in-lieu fees, as well as park and recreation Development Impact Fees, as required by the Municipal Code. The proposed General Plan text amendment for Transitional Neighborhood states that onsite neighborhood parks, community swimming pools, dog parks, and/or open space amenities are integral components of the proposed designation (see Exhibit 1-6), and future development would be required to comply this requirement. While the proposed GPA may result in slightly more usage of City parks and recreational facilities, impacts are expected to be largely consistent with those identified in the GPU EIR and would remain less than significant with implementation of standard requirements.

[2] Report E-5: City/County Population and Housing Estimates, January 1, 2020, California Department of Finance.

VENTANA Specific Plan

The proposed VENTANA Project site is located in southwest Indio and in relatively close proximity to many parks and recreational facilities. It is approximately 0.8 miles southwest of Hjorth Street Park, and approximately 1.7 miles south of Shields Park. Existing and planned bike paths extend along major roadways in the Project area, including Avenue 50, Jefferson Street and Madison Street. There are existing City trails along Avenue 50, Madison Street and Avenue 49 in the Project vicinity.

The proposed Specific Plan will result in the development of a 103-unit single family residential community with onsite recreational amenities, including a community park, dog park, and network of sidewalks and pedestrian trails. The Project will also include approximately 7.15 acres of landscaped areas and green space, which is roughly equivalent to 21 acres of open space per 1,000 residents and exceeds the 3 acres per 1,000 residents City standard. The Specific Plan also includes development of a sidewalk and bike lane along its Avenue 50 frontage.

Based on an average household size of 3.31 persons[3], at build out, the Specific Plan is expected to generate 341 residents. Residents can be expected to utilize onsite recreational amenities as well as local and regional recreational facilities. The Project may marginally increase the usage of City and regional parks and recreational facilities, particularly those in close proximity to the Project site, including Hjorth Street Park and the surrounding bike paths. However, the proposed development will not induce substantial population growth that will result in significant impacts to existing neighborhood and regional parks or other recreational facilities. The Project will not require the development of new parks or recreational facilities, or the expansion of existing facilities to support future residents. Impacts to parks and recreational facilities will be less than significant.

b) Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.

General Plan Amendment

As discussed above, the General Plan identified future park and trail improvement/ expansion/construction projects, including expansion of Dr. Carreon Park and a new neighborhood park located south of Avenue 49 and west of Monroe Street near the Project site. According to the GPU EIR, the identification of environmental impacts of future proposals for new park facilities in the City, either as stand-alone projects or proposed in conjunction with a new development, would be speculative. The GPU EIR indicated that Individual recreational facilities would be subject to project-level environmental review under CEQA and appropriate mitigation measures would be developed for individual parks as they are proposed and constructed.

[3] Ibid.

Regardless of the land use designation, future projects on the Project site will be required to provide parkland or in-lieu fees, and park and recreation Development Impact Fees, as required by the Municipal Code, and abide by other applicable City regulations on recreational facilities. The proposed GPA would not result in new or expanded parks or recreational facilities that would have an adverse physical impact on the environment. Development plans and completed recreational improvements would be subject to standard City reviews and inspections to assure they are safely designed and built. Impacts will be less than significant and addressed at project-level environmental review for future recreational facility development.

VENTANA Specific Plan
As discussed above, the Project proposes onsite recreational amenities, including a community park, dog park, sidewalks and trails, and open space common areas. The provision of open space is consistent with the requirements of the Zoning Ordinance for residential projects. The Project also includes completion of a sidewalk and bike lane on its Avenue 50 frontage. No construction or expansion of off-site parks or recreational facilities will be required.

As demonstrated throughout this EIR, any potential adverse physical impacts associated with the construction or operation of these facilities can be mitigated to less than significant levels. For example, temporary air pollutant emissions generated during the construction phase will be mitigated to less than significant levels through implementation of mitigation measures cited in Sections 2.5 (Air Quality) and 2.10 (Greenhouse Gas Emissions). Recreational improvements will be subject to design review and physical inspection by the City. Impacts will be less than significant.

2.17.7 Mitigation Measures

None required.

2.17.8 Significance After Mitigation

Impacts will be less than significant.

2.17.9 Cumulative Impacts

The study area for the GPU EIR (page 5-18) assessment of cumulative impacts to recreational resources was the applicable provider's service area. The EIR determined that future development in the service area could result in cumulative impacts associated with additional demands for parks and recreational facilities, resulting in the need for new or expanded facilities. However, policies in the General Plan would ensure that adequate parks and recreational facilities must be assured prior to development (Policies PR-2.8: New Development, and LU-12.2: Adequate Infrastructure); therefore, the General Plan's incremental contribution to parks and recreational facilities impacts would not be cumulatively considerable. As noted above, planned future parks and recreational facilities in the City are

expected to serve full buildout of the General Plan. Compared to the General Plan, maximum buildout of the proposed GPA, the additional 91 units would result in a 0.2% increase in the number of dwelling units and buildout of the 103 units from the proposed Project would result in a 0.3% increase, but both would develop the same parcels and acreage as the current General Plan designation. As noted, the Project includes landscaped areas and green space, which exceeds the 3 acres per 1,000 residents City standard within the subject property. The Project will also be required to pay DIF fees for parks and recreation facilities. The Project, therefore, would result in only a marginal increase in development and would not contribute considerably to cumulative impacts on recreational services in the City.

2.18 Transportation and Traffic

2.18.1 Introduction

This section of the EIR describes the existing transportation conditions within the Project area and analyzes the potential impacts of the proposed General Plan Amendment and the VENTANA Specific Plan Project on traffic, circulation, and emergency access. The analysis is based on a wide range of data and information, ranging from research and analysis conducted for specific projects in the area to regional-scale planning and environmental documents. The Project-specific Traffic Impact Analysis, prepared by Kunzman Associates[1] in January 2021 is included in Appendix K.

2.18.2 Thresholds of Significance

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

a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities.

b) Conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b).

c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).

d) Result in inadequate emergency access.

2.18.3 Regulatory Framework

Federal

No federal regulations associated with transportation are applicable to the proposed Project.

State

Highways Jurisdiction

The California Department of Transportation (Caltrans) has jurisdiction over state highway facilities, including freeway segments, signalized intersections on state highways, and on- and off-ramp intersections with local roadways.

[1] "VENTANA Traffic Impact Analysis", prepared by Kunzman Associates, January 25, 2021.

Complete Streets Act

Assembly Bill (AB) 1358 (2008) requires cities and counties to include complete streets policies as part of their general plans. "Complete streets" are transportation facilities that are planned, designed, operated, and maintained to provide safe and convenient mobility for all users, including bicyclists, pedestrians, transit riders, persons with disabilities, seniors, movers of commercial goods, and motorists, appropriate to the function and context of the facility. Complete streets are intended to decrease the number of vehicle trips traveled, reduce associated air pollutants and greenhouse gas emissions, improve community livability, and improve public health and safety.

SB 743: California Environmental Quality Act Transportation Analysis Changes

SB 743 (2013) created a process to change the way projects analyze transportation impacts pursuant to CEQA. Environmental review of transportation impacts traditionally focused on the delay that vehicles experience at intersections and on roadway segments, often measured using level of service (LOS). SB 743 required amendments to the CEQA Guidelines (pre-2019) to provide an alternative to LOS for evaluating transportation impacts. Particularly within areas served by transit, those alternative criteria must "promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses." (Public Resources Code Section 21099(b)(1)). Measurements of transportation impacts may include "vehicle miles traveled, vehicle miles traveled per capita, automobile trip generation rates, or automobile trips generated."

CEQA Guidelines section 15064.3 sets forth guidelines for implementing Senate Bill 743 (SB 743). The City of Indio has not adopted a vehicle miles traveled (VMT) policy. The Project-specific Traffic Impact Analysis follows the VMT policy adopted by the County of Riverside (as revised December 20, 2020).[2]

Regional and Local

Regional Transportation Plan/Sustainable Communities Strategy

The Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) identifies policies, projects, and programs needed over a 20+ year period to maintain, manage, and improve the transportation systems in the Southern California Association of Governments (SCAG) region. The RTP/SCS is updated every four years. The 2020-2045 RTP/SCS includes regional growth forecasts, a strategic plan, and a sustainable communities strategy to improve the transportation system to meet the demands of a growing population. It promotes active transportation improvements, such as a regional greenway network, regional bikeway network, bike share services, complete streets with sidewalks, and neighborhood mobility areas.[3]

[2] Transportation Analysis Guidelines for Level of Service Vehicle Miles Traveled, County of Riverside, Transportation Department, December 2020.

[3] 2020-2045 Regional Transportation Plan/ Sustainable Communities Strategy, Southern California Association of Governments, 2020.

Congestion Management Plan (CMP)

The Riverside County Congestion Management Plan (CMP) was prepared by the Riverside County Transportation Commission (RCTC) in 2011 to improve the county's transportation system. The CMP links land use, transportation, and air quality in the county to prompt reasonable growth management programs, alleviate traffic congestion, and improve air quality. Local agencies work with the County to meet CMP goals.

The CMP establishes minimum traffic level-of-service (LOS) standards for a system of highways and roadways, including state highways and principal arterials, designated by RCTC. Transportation Systems Management (TSM) and Transportation Demand Management (TDM) strategies are also adopted to improve LOS. In the Indio area, Interstate 10 and Highway 111 are designated as CMP roadways,[4] and Highway 111 passes through the northern Project vicinity.

CVAG Active Transportation Plan

The Coachella Valley Association of Governments (CVAG) Active Transportation Plan[5] (2016) establishes a coordinated, long-range plan for developing regional bicycle, pedestrian, and neighborhood electric vehicle (NEV) facilities in the Coachella Valley.

Transportation Uniform Mitigation Fee Program

The Transportation Uniform Mitigation Fee (TUMF) program is administered by the Coachella Valley Association of Governments (CVAG) to generate additional funds required for improvements to the regional transportation system. The TUMF boundary covers the entire Coachella Valley region, including the City of Indio. TUMF development impact fees are collected by participating jurisdictions from new residential and non-residential development at the building or occupancy permit stage. Collected fees are transferred to CVAG for allocation to the Regional Arterial Program.

Transportation Project Prioritization Study

The Coachella Valley Association of Governments (CVAG) is responsible for identifying and prioritizing transportation projects in the Coachella Valley. The 2016 Transportation Prioritization Study (TPPS) ranks regionally significant roadway segments to determine which have the greatest need for improvement and where funding should be directed.

City of Indio General Plan

The City of Indio General Plan sets forth future transportation goals, policies, and programs. Policies from the Mobility Element that are relevant to the proposed Project include the following:

Goal ME-1 Complete Streets. A City that embraces complete streets by providing streets that are safe and accessible by users of all ages and all abilities

[4] Table 2-1, 2011 Riverside County Congestion Management Program.

[5] "Coachella Valley Association of Governments Active Transportation Plan," Michael Baker International, 2016.

Policy ME-1.4 Street Connectivity. Encourage short block spacing for new development consistent with the Land Use and Community Design Element to enhance connectivity to neighborhoods. In key areas of the City (e.g. the pedestrian-priority areas, Downtown, Midtown, and the Festival District), work with existing land owners to improve connectivity for bicycles and pedestrians.

Policy ME-1.11 Residential Streets. Design residential streets to minimize traffic volumes and/or speed, as appropriate, without compromising connectivity for emergency first responders, bicycles, and pedestrians. This could be accomplished through management and implementation of complete streets strategies, short block lengths, narrow streets, and/or traffic calming measures.

According to City standards, the intersection LOS standard is LOS D, where reasonable and feasible. Where a peak hour intersection LOS D is not reasonable or feasible, then LOS E shall be the standard. The following factors are to be considered when determining whether LOS D is reasonable and feasible:

- Excessive right-of-way acquisition to attain LOS D
- Unreasonable costs to attain LOS D
- Impacts to other environmental resources to achieve LOS D, such as biological resources or cultural resources such as historic properties.
- Conflicts with other general plan policies, such as:
  - Provisions for alternative transportation such as public transit, pedestrian facilities and/or bicycle routes
  - Provisions for neighborhood preservation

2.18.4 Environmental Setting

Roadway Network

Regional connectivity for the City of Indio is provided by Interstate 10 (I-10), Highway 111, and State Route 86. I-10 extends through the Coachella Valley in a northwest-southeasterly trending direction and connects the region to western Riverside County and the Los Angeles metropolitan area to the west, and desert communities and Arizona to the east. Highway 111 is south of and roughly parallel to I-10. Highway 111 accommodates local and regional traffic through one of the City's principal commercial corridors and connects to other Coachella Valley communities, from Palm Springs on the west to the Salton Sea and Imperial County on the east. State Route 86 runs north-south, splitting from I-10 just south of Golf Center Parkway and continuing south to Calexico and the U.S.-Mexico border.

Arterials in the City are generally developed in a north-south/east-west grid pattern. The major arterials serving Indio include Washington Street, Jefferson Street, Monroe Street, Madison Street, Jackson Street, Fred Waring Drive, Avenues 48, 50 and 52, and segments of Highway 111. I-10 interchanges at Washington, Dillon, Jefferson, Monroe and Jackson Streets, and Golf Center Parkway provide local access in the City of Indio.

Non-Motorized Circulation

Connections between roadways and transit facilities are provided through a network of sidewalks, crosswalks and curb ramps. Bicycle and golf cart facilities include a combination of separated pathways, on-road bike lanes, and shared road facilities. On Avenue 50, a multi-use path exists on the south side of the street, in the City of La Quinta. The Indio General Plan calls for the development of a Class 4 Cycle Track on the north side of Avenue 50, from Jefferson to Jackson Streets.

The CV Link project is a backbone multi-modal transportation facility that aims to connect eight Coachella Valley cities, including Indio, the County of Riverside and three Indian reservations with a multi-use path, providing connections for bicycles, pedestrians, and low-speed electric vehicles, to access employment, shopping, schools, residences, and recreational opportunities. As proposed, the CV Link is a Class I multiuse path that in Indio would run along the Coachella Valley Stormwater Channel.

Truck Routes

Interstate-10 and Highway 111 are part of the highway truck route system. The City of Indio General Plan (2020) requires the City to update its truck route map. The General Plan recognizes major arterials as preferred truck routes.

Public Transit

Public transportation in the Coachella Valley consists of transit bus service operated by the SunLine Transit Agency. Seven bus routes serve the City of Indio, which are largely concentrated around the downtown area and corridors of Washington Street, Fred Waring Drive, and Highway 111.[6] SunLine also operates paratransit service, known as SunDial, to supplement fixed route service and to meet the requirements of the Americans with Disabilities Act (ADA).

Airports

The Coachella Valley is served by three airports. The Palm Springs International Airport is the largest and primary passenger air transportation link for the region. It is 16± miles northwest of the subject property and classified in the National Plan of Integrated Airport Systems (NPIAS) as a long-haul commercial service airport. It also handles air freight and provides heliport access that is largely limited to medical evacuation flights between the Desert Regional Medical Center and Eisenhower Medical Center.

The Bermuda Dunes Airport is a privately owned, public use airport approximately 3.7± miles northwest of the subject property. It accommodates corporate and private aircraft and is the designated airport for medical evacuation flights for John F. Kennedy Hospital and Eisenhower Medical Center.

The Jacqueline Cochran Regional Airport, in the unincorporated community of Thermal, is 6.7± miles southeast of the subject property and caters to business and private aviation aircraft.

[6] https://www.sunline.org, accessed February 2021.

Railroads

Rail lines operated by Union Pacific Railroad (UPRR) cross through the Coachella Valley in a northwest-southeast trending direction, roughly parallel to and immediately south of Interstate-10. They accommodate freight traffic as well as Amtrak's Sunset Limited that provides passenger service between Los Angeles and New Orleans. Amtrak operates an open-air train station in Palm Springs for the Sunset Limited. The rail lines are approximately 3 miles northeast of the Project site, and the nearest train station in Palm Springs is 22± miles to the northwest.

2.18.5 Existing Conditions

Existing conditions in the Project area were analyzed in the Project-specific Traffic Impact Analysis (Appendix K). The boundaries of the study area were determined in coordination with the City of Indio. Data collection included manual weekday morning and evening peak hour intersection turning movement counts in April 2019 and March 2020 at eight (8) intersection analysis locations, as shown on Exhibit 2.18-1.

Roadways and Traffic Volumes

As shown on Exhibit 2.18-1 and the City's Circulation Plan (General Plan Figure 4-3), Jefferson Street is the only arterial in the vicinity of the Project. Other main roadways in the area are designated as Boulevard, including Avenue 48, Avenue 50, Madison Street, and Monroe Street.

Jefferson Street is approximately a half mile west of the Project site. It is a north-south arterial that extends from Avenue 38 to Avenue 54 in Indio and La Quinta. South of Avenue 40, it is designated as an Arterial in the City of Indio General Plan and is constructed as a six-lane, physically divided roadway with bike lanes in each direction south of I-10, including in the Project area.

Madison Street is approximately a half mile east of the Project site. Madison Street primarily connects residential neighborhoods to the greater roadway network and consists of three non-continuous segments. On the southern segment from Highway 111 to Avenue 52, Madison Street varies from three to four lanes with either a continuous left-turn lane or raised median. In the Project area, Madison Street is designated a four-lane divided Boulevard.

Monroe Street operates with four lanes and a center left-turn lane south of I-10. No bicycle facilities are present on Monroe Street. It operates as a 4-lane divided Boulevard approximately 1.5 miles east of the Project area.

Immediately south of the Project site, Avenue 50 between Jefferson Street and Madison Street has two eastbound lanes and one westbound lane, divided by a continuous center left-turn lane. Avenue 50 from Madison Street to Monroe Street is two lanes divided by a continuous center left-turn lane. East of Monroe Street, Avenue 50 has two westbound lanes and a single eastbound lane, divided by a continuous center left-turn lane. Avenue 50 is designated a Boulevard in the City's General Plan.

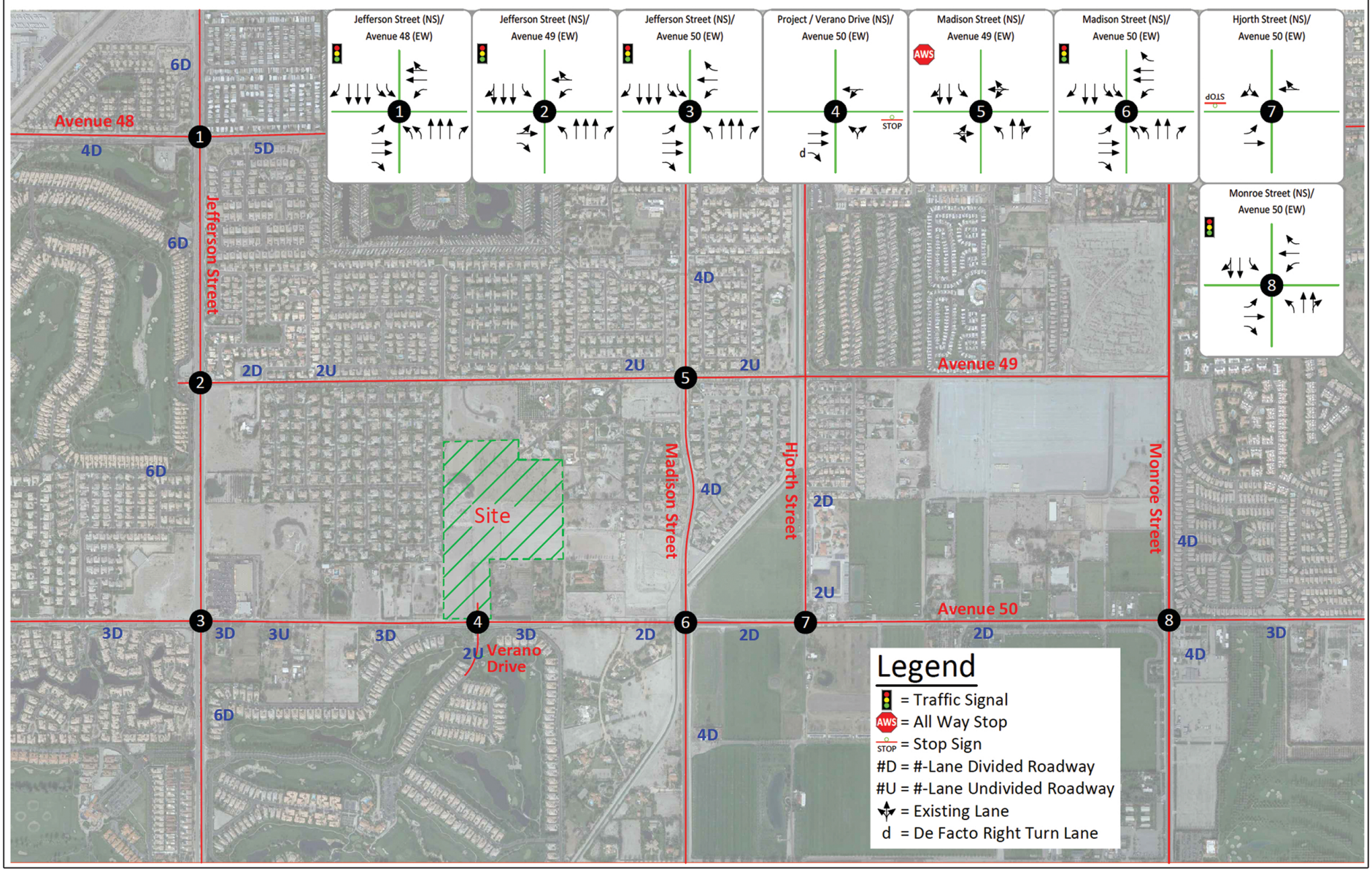
Avenue 48 is a five-lane roadway (three-lane eastbound, two-lane westbound) east of Jefferson Street with a painted median and left-turn pocket. It is designated a Boulevard in the City's General Plan.

The GPU EIR found that under existing conditions (2019) throughout the City, four roadway segments and four intersections operated at LOS E or lower. Of these segments and intersections, Madison Street and Avenue 50 is the only intersection in the Project area. It operated at LOS D in the PM peak hour, but is reduced to LOS E in the AM peak hour, according to the GPU EIR's analysis. At the time of the analysis, this intersection operated with a 4-way stop sign. Since that time, a traffic signal has been installed.

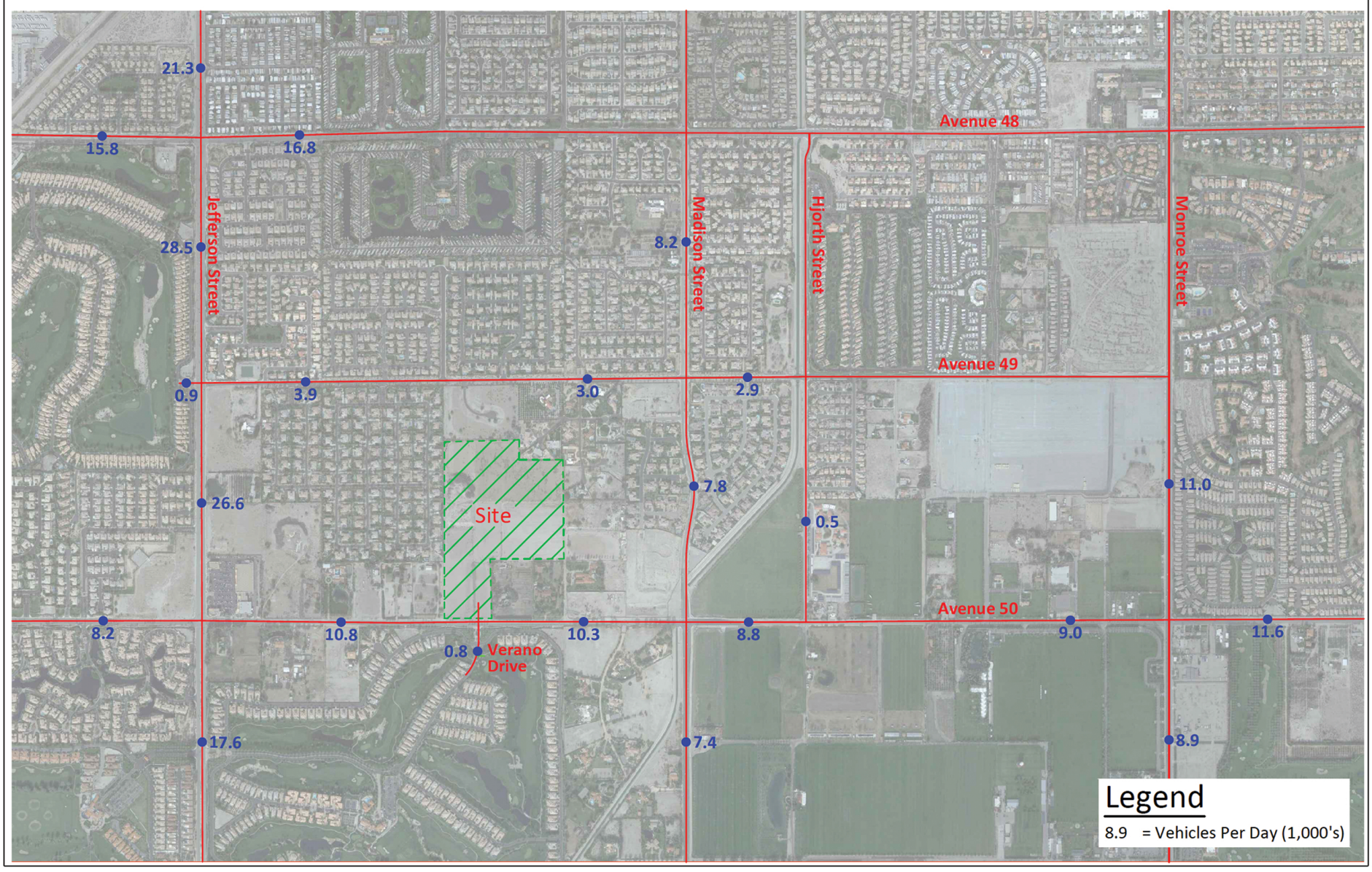
Existing weekday average daily traffic (ADT) volumes on roadways in the study area are shown on Exhibit 2.18-1. They are based on manual traffic counts collected in the Project area in April 2019 and March 2020. As shown on the Exhibit, Avenue 50 currently carries 10,800 ADT east of Jefferson Street, and 10,300 ADT west of Madison Street in the vicinity of the project site.

Under existing conditions, all roadway segments operate at LOS B or better (see Table 9 of Appendix K).

Existing Through Travel Lanes and Intersection Controls



Existing Average Daily Traffic Volumes



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02.17.21

Source: Kunzman and Associates, 2021

TERRA NOVA®
PLANNING & RESEARCH, INC.

VENTANA Specific Plan EIR
Study Area Intersections and Existing (2019-2020) Traffic Volumes
Indio, California

Exhibit
2.18-1

Intersections and Level of Service

Traffic operations of roadway facilities are described in terms of Level of Service (LOS). LOS is a qualitative measurement that is typically dependent on the quality of traffic flow at the intersections along a roadway. LOS describes roadway intersection operating conditions in a range of alphabetical connotations, "A" through "F". LOS A represents the best, free flow conditions, and LOS F indicates the worst conditions and extensive queueing. As described above, the City's LOS standard is generally D, although LOS E can be acceptable under specific conditions.

The findings of the existing intersection operations analysis are shown in Table 2.18-1. Under existing (2019-2020) conditions, all study area intersections operate at an acceptable LOS (C or better) during the peak hours. No traffic signal is warranted at any unsignalized intersection in the Project area under existing traffic conditions.

Table 2.18-1
Existing Intersection Delay and Levels of Service

Study Intersection	Traffic Control[1]	AM Peak Hour		PM Peak Hour	
		Delay[2]	LOS[3]	Delay	LOS
1. Jefferson Street / Avenue 48	TS	21.7	C	26.0	C
2. Jefferson Street / Avenue 49	TS	17.1	B	13.4	B
3. Jefferson Street / Avenue 50	TS	24.1	C	21.2	C
4. Verano Drive / Avenue 50	CSS	16.5	C	17.2	C
5. Madison Street / Avenue 49	AWS	11.0	B	10.5	B
6. Madison Street / Avenue 50	TS	23.4	C	22.4	C
7. Hjorth Street / Avenue 50	CSS	21.1	C	16.3	C
8. Monroe Street / Avenue 50	TS	20.5	C	18.4	B

(1) TS = Traffic Signal; AWS = All Way Stop; CSS = Cross Street Stop
(2) Delay is shown in seconds/vehicle. For intersections with traffic signal or all way stop control, overall average intersection delay and LOS are shown. For intersections with cross street stop control, Level of Service is based on average delay of the worst individual lane (or movements sharing a lane).
(3) LOS = Level of Service

Truck Routes

The General Plan recommended that the City update the designated truck routes and recognizes major arterials as preferred truck routes. In the Project area, Jefferson Street is the only arterial and may be used by trucks as a preferred route.

Public Transit

Currently, the Project site and vicinity are not served by SunLine. The nearest stops are at Jefferson and Madison Streets and Highway 111, served by Route 1 and located approximately 1.25 miles northwest and northeast of the Project site, respectively.

Pedestrian and Bike Facilities

There is currently no sidewalk or dedicated bicycle facilities located along Avenue 50 in the City's half of Avenue 50. A 10' multi-purpose trail meanders on the south side of Avenue 50, in the City of La Quinta. The closest existing bicycle facilities are located along Jefferson Street (Class 2 – Bike Lane).

2.18.6 Project Impacts

a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities.

A Traffic Impact Analysis (TIA) was prepared specific to both the General Plan Amendment and the build out of the VENTANA Specific Plan, Tentative Tract Map and Design Review. The TIA considered potential impacts at 8 Project area intersections:

Jefferson Street at:
- Avenue 48
- Avenue 49
- Avenue 50

Verano Drive at Avenue 50
Madison Street at:
- Avenue 49
- Avenue 50

Hjorth Street at Avenue 50
Monroe Street at Avenue 50

In addition to determining existing conditions in the study area, as described above, the TIA also considered existing conditions with the proposed Project, and at maximum density under the General Plan Amendment to establish a baseline. The TIA then considered the impacts of traffic generated by the General Plan Amendment and the Project based on Opening Year (2022) without and with Project, with build out of the General Plan Amendment; and Year 2040 (General Plan buildout) without and with Project, and with build out of the General Plan Amendment.

Areawide growth was included in the analysis of two scenarios: a conservative annual growth rate of 4.8% was applied for Opening Year (2022) traffic conditions, and an annual growth rate of 2% was applied for Year 2040 traffic conditions.

The complete analysis is contained in Appendix K, and summarized in the analysis below.

General Plan Amendment

The proposed General Plan Amendment would change the land use designation on the Project site from Desert Estates Neighborhood (up to 1 du/ac) to Transitional Neighborhood (0-3 du/ac), thereby increasing the development potential on the subject property from a maximum buildout of 45 dwelling units to 136 dwelling units. The GPA would revise the General Plan land use map and text accordingly, and the amendments would apply only to the subject property.

City LOS Policy

According to the City of Indio General Plan (Policy ME-1.8), the intersection Level of Service standard will be LOS D, where reasonable and feasible. Where a peak hour intersection LOS D is not reasonable or feasible based on certain factors (see Section 2.18.3 above), LOS E shall be the standard and represents "at capacity" operations.

The GPU EIR analyzed traffic resulting from build out of the General Plan based on traditional LOS criteria, and the policies contained in the Mobility Element of the General Plan, and based on the land uses assigned in the Land Use Element. Based on these assumptions, the GPU EIR found that at build out, the following LOS would occur at intersections in the Project Area:

- Jefferson Street and Avenue 48: LOS D in the AM and PM peak hour, representing a less than significant impact.
- Jefferson Street and Avenue 50: LOS D in the AM and PM peak hour, representing a less than significant impact.
- Madison Street and Avenue 50: Los C in the AM and PM peak hour, representing a less than significant impact.

The GPU EIR found that 5 intersections in the City would experience LOS E or worse conditions at General Plan build out. Three of these intersections were on Washington Street, and two on Madison Street at Fred Waring and Avenue 52, outside the Project area. Both these intersections would operate at acceptable LOS with the implementation of MM-TRF-1 and MM-TRF-2, which require restriping at these intersections. Impacts at the other intersections and on the I-10 freeway, however, could not be mitigated, based on the analysis in the GPU EIR, and therefore the EIR determined that impacts would be significant and unavoidable. Please also see the Cumulative Impact discussion in Section 2.18.9.

In order to assess the site-specific impacts of the General Plan Amendment, the TIA analysis considered its impacts. The TIA first considered existing plus GPA conditions (E+GPA), a hypothetical scenario that nevertheless considers the GPA's impacts on current traffic movements. The TIA then assumed that the opening year and full operations of the development under the GPA would occur in 2022. The findings for these scenarios are described below.

Existing Conditions Plus General Plan Amendment (E+GPA) Impacts

E+GPA weekday average daily traffic (ADT) volumes are shown in Exhibit 2.18-2. A comparison with Exhibit 2.18-1 (Existing 2019-2020 Traffic Volumes) shows that the GPA buildout would result in limited ADT increases throughout the study area. Table 2.18-2 compares intersection operations in the study area under existing (2019-2020) conditions and E+GPA conditions. The GPA buildout would make a limited contribution to increased delays at some of the study area intersections, but all intersections are expected to operate at LOS C or better, with or without improvements at Verano Road, which will be the Project access point.

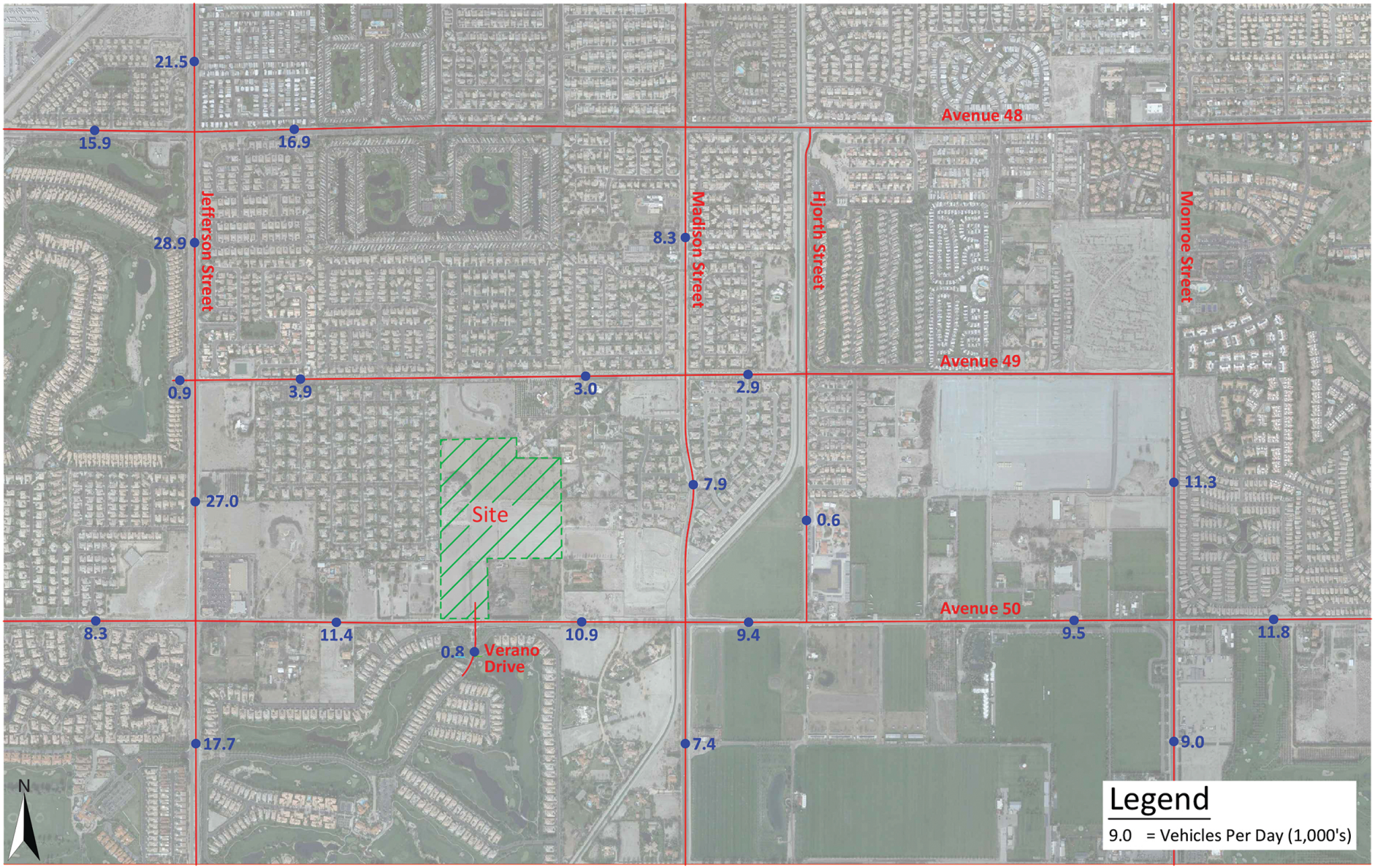
Table 2.18-2
Intersection Analysis for E+GPA Conditions

Study Intersection	Traffic Control[2]	Existing (2019-2020)				E+GPA			
		Delay[1] (secs.)		Level of Service		Delay[1] (secs.)		Level of Service	
		AM	PM	AM	PM	AM	PM	AM	PM
1. Jefferson Street / Avenue 48	TS	21.7	26.0	C	C	21.7	26.0	C	C
2. Jefferson Street / Avenue 49	TS	17.1	13.4	B	B	17.2	13.4	B	B
3. Jefferson Street / Avenue 50	TS	24.1	21.2	C	C	24.4	21.6	C	C
4. Verano Drive / Avenue 50									
- Without Improvements	CSS	16.5	17.2	C	C	22.2	24.9	C	C
- With Improvements	CSS	-	-	-	-	19.0	19.4	C	C
5. Madison Street / Avenue 49	AWS	11.0	10.5	B	B	11.0	10.5	B	B
6. Madison Street / Avenue 50	TS	23.4	22.4	C	C	23.5	22.8	C	C
7. Hjorth Street / Avenue 50	CSS	21.1	16.3	C	C	23.1	17.4	C	C
8. Monroe Street / Avenue 50	TS	20.5	18.4	C	B	20.8	18.3	C	B

[1] Per the Highway Capacity Manual, overall average intersection delay and level of service are shown for intersections with a traffic signal or all-way stop control. For intersections with cross street stop control, the delay and level of service for the worst individual movement (or movements sharing a single lane) are shown.
[2] CSS = Cross-street Stop; TS = Traffic Signal; AWS = All Way Stop.
Source: Tables 3 & 8, VENTANA Traffic Impact Analysis, Kunzman Associates, January 25, 2021.

There would be no Project area intersections that would operate at an unacceptable LOS with the addition of GPA traffic, and no intersections are anticipated to warrant a traffic signal as a result of the GPA. In addition, all roadway segments operate at LOS B or better under this scenario. The TIA did not recommend any improvement or mitigation for Existing Plus GPA conditions.

Existing Plus Project Average Daily Traffic Volumes - Potential Maximum Density



02.17.21

Source: Kunzman and Associates, 2021

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VENTANA Specific Plan EIR
Existing Plus General Plan Amendment (E+GPA) Traffic Volumes
Indio, California

Exhibit
2.18-2

Opening Year (2022) with GPA (2022+GPA) Impacts

2022+GPA weekday average daily traffic (ADT) volumes are shown in Exhibit 2.18-3. Table 2.18-3 compares intersection operations in the study area in Opening Year (2022) without and with the GPA buildout. As shown, the study area intersections are projected to operate at Levels of Service D or better during the peak hours with and without the GPA, with and without improvements at Verano Drive.

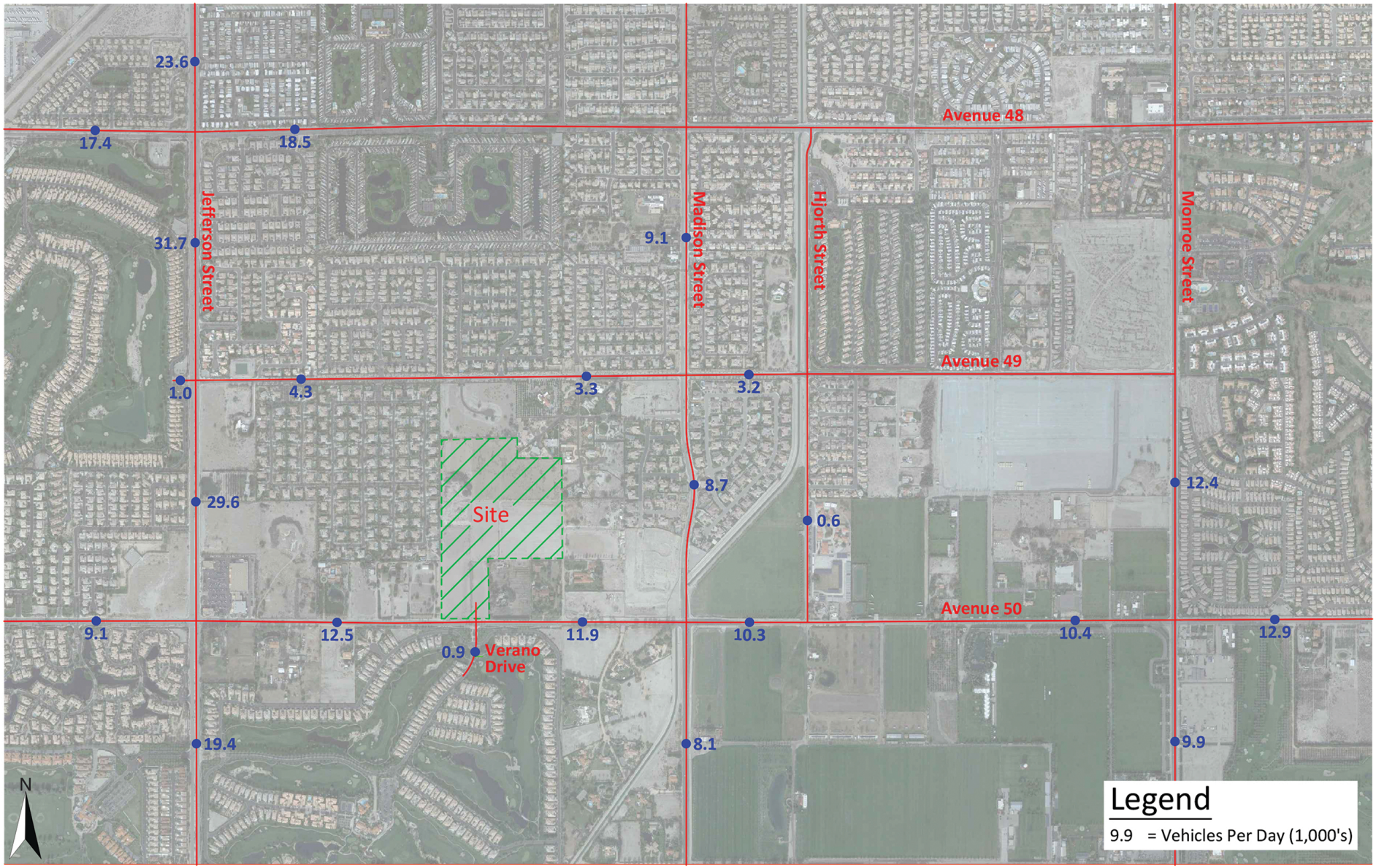
Table 2.18-3
Intersection Analysis for Opening Year (2022) Conditions

Study Intersection	Traffic Control[2]	2022 Without GPA				2022 With GPA			
		Delay[1] (secs.)		Level of Service		Delay[1] (secs.)		Level of Service	
		AM	PM	AM	PM	AM	PM	AM	PM
1. Jefferson Street / Avenue 48	TS	22.3	29.0	C	C	22.4	29.1	C	C
2. Jefferson Street / Avenue 49	TS	18.5	14.5	B	B	18.5	14.6	B	B
3. Jefferson Street / Avenue 50	TS	25.5	22.0	C	C	25.9	22.5	C	C
4. Verano Drive / Avenue 50									
- Without Improvements	CSS	18.1	19.0	C	C	25.3	28.5	D	D
- With Improvements	CSS	-	-	-	-	21.1	21.3	C	C
5. Madison Street / Avenue 49	AWS	11.7	11.1	B	B	11.8	11.1	B	B
6. Madison Street / Avenue 50	TS	23.5	22.7	C	C	23.6	23.0	C	C
7. Hjorth Street / Avenue 50	CSS	25.2	17.8	D	C	28.1	19.1	D	C
8. Monroe Street / Avenue 50	TS	20.6	18.6	C	B	21.0	18.6	C	B

[1] Per the Highway Capacity Manual, overall average intersection delay and level of service are shown for intersections with a traffic signal or all-way stop control. For intersections with cross street stop control, the delay and level of service for the worst individual movement (or movements sharing a single lane) are shown.
[2] CSS = Cross-street Stop; TS = Traffic Signal; AWS = All Way Stop.
Source: Tables 10 & 14, VENTANA Traffic Impact Analysis, Kunzman Associates, January 25, 2021.

Therefore, if the General Plan Amendment were to be built out at its full capacity of 136 units, intersection impacts in the short term would be less than significant. In addition, under Opening Year conditions, all roadway segments operate at LOS B or better. Please See Section 2.18.9 for an analysis of the impacts of the General Plan Amendment at General Plan build out.

Opening Year (2022) With Project Average Daily Traffic Volumes - Potential Maximum Density



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Source: Kunzman and Associates, 2021

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VENTANA Specific Plan EIR
Opening Year (2022) With General Plan Amendment Traffic Volumes
Indio, California

Exhibit
2.18-3

Alternative Transportation Planning

As discussed above, the proposed GPA would create and apply a more intense residential land use designation to the Project site. However, it would not revise or otherwise impact General Plan goals, policies and programs for the purpose of encouraging alternative transportation modes.

According to the City of Indio GPU EIR, the Mobility Element sets forth policies that support upgrades to existing circulation facilities to establish a comprehensive multi-modal system that provides enhanced connectivity, safety, and comfort for all modes of transportation. Additionally, the Mobility Element includes goals and policies to provide "Complete Street" policies as directed by the Complete Streets Act. The General Plan also includes goals and policies (Policy ME-7.1 through ME 7.3) that support traffic demand management strategies in SCAG's 2016-2040 RTP/SCS; Policy ME-2.1 to support the CV Link; and Goal ME-3 to encourage collaboration with the SunLine Transit Agency.

Avenue 50 is a future bicycle corridor in the City's General Plan with planned Class 4 – Cycle Track (General Plan Figure 4-7). If developed under the GPA, the site would be required to widen Avenue 50 to its ultimate half-width, and include bicycle facilities. Upon completion of the bicycle facilities proposed in the General Plan, future residents on the Project site will have immediate access to the bicycle network along surrounding major streets. The General Plan Amendment would have equivalent impacts to those analyzed in the GPU EIR on bicycle facilities, insofar as built out of these facilities on Avenue 50 would be required under existing or proposed General Plan designations, and impact would remain less than significant.

Future residents, guests, visitors, and employees (construction, security, maintenance etc.) may access SunLine bus service through alternative means such as biking, given the distance between the Project site and bus stops. Over time, as with the build out of the General Plan under current conditions, bus routes and other alternatives will increase, and may be provided on Jefferson Street, given its high projected traffic volumes and designation as a major regional roadway. Should that expansion occur, residents of the project site, whether developed under the current designation or the proposed GPA, would have access to transit service within ½ mile, which is considered a practical distance for bus access. Therefore, implementation of the General Plan Amendment would have equivalent impacts to those considered in the GPU EIR, and remain less than significant.

The proposed GPA will not conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities. Impacts would be equivalent to those identified in the General Plan, and less than significant.

VENTANA Specific Plan

The TIA evaluated three Project impact scenarios; two impact scenarios are described below, and one cumulative impact scenario is described in Section 2.18.9, Cumulative Impacts. Detailed descriptions, data tables, and exhibits are contained in the TIA (Appendix K).

The VENTANA Specific Plan, Tentative Tract Map and Design Review would result in the development of 103 single family homes on the subject 45 acre site. The TIA assumed that the opening year and full operations of the Project would occur in 2022, and determined that the proposed Project would generate 972 daily trips. Full access to the Project would be provided on Avenue 50 with a stop sign at the intersection of the Project driveway and Avenue 50. The TIA considered existing plus Project conditions (E+P), a hypothetical scenario that nevertheless considers the Project's impacts on current traffic movements. The TIA also considered Opening Year 2022 impacts with the Project (2022+P). The findings for these scenarios are described below.

Existing Conditions Plus Project (E+P) Impacts

E+P weekday average daily traffic (ADT) volumes are shown in Exhibit 2.18-4. When compared with Exhibit 2.18-1 (Existing 2019-2020 Traffic Volumes), the Project would result in limited ADT increases throughout the study area. Table 2.18-4 compares intersection operations in the study area under existing (2019-2020) conditions and E+P conditions. The Project would make a very limited contribution to increased delays at some of the study area intersections, but all intersections are expected to operate at LOS C or better without improvements at Verano Drive.

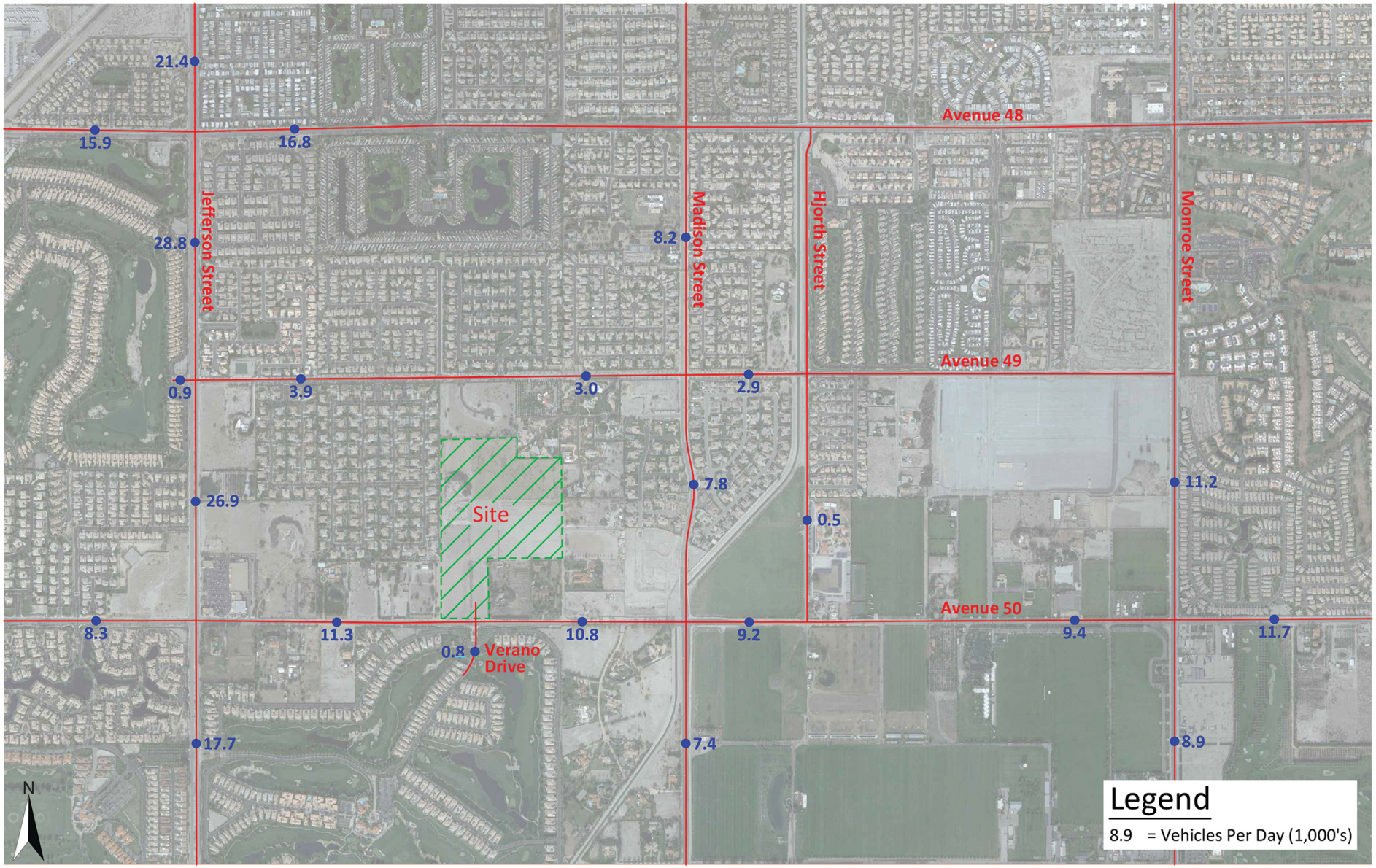
Table 2.18-4
Intersection Analysis for E+P Conditions

Study Intersection	Traffic Control[2]	Existing (2019-2020)				E+P			
		Delay[1] (secs.)		Level of Service		Delay[1] (secs.)		Level of Service	
		AM	PM	AM	PM	AM	PM	AM	PM
1. Jefferson Street / Avenue 48	TS	21.7	26.0	C	C	21.7	26.0	C	C
2. Jefferson Street / Avenue 49	TS	17.1	13.4	B	B	17.2	13.4	B	B
3. Jefferson Street / Avenue 50	TS	24.1	21.2	C	C	24.3	21.5	C	C
4. Verano Drive / Avenue 50									
- Without Improvements	CSS	16.5	17.2	C	C	21.1	23.2	C	C
- With Improvements	CSS	-	-	-	-	18.3	18.4	C	C
5. Madison Street / Avenue 49	AWS	11.0	10.5	B	B	11.0	10.5	B	B
6. Madison Street / Avenue 50	TS	23.4	22.4	C	C	23.4	22.7	C	C
7. Hjorth Street / Avenue 50	CSS	21.1	16.3	C	C	22.6	17.1	C	C
8. Monroe Street / Avenue 50	TS	20.5	18.4	C	B	20.7	18.4	C	B

[1] Per the Highway Capacity Manual, overall average intersection delay and level of service are shown for intersections with a traffic signal or all-way stop control. For intersections with cross street stop control, the delay and level of service for the worst individual movement (or movements sharing a single lane) are shown.
[2] CSS = Cross-street Stop; TS = Traffic Signal; AWS = All Way Stop.
Source: Tables 3 & 7, VENTANA Traffic Impact Analysis, Kunzman Associates, January 25, 2021.

There would be no Project area intersections that would operate at an unacceptable LOS with the addition of Project traffic, and no intersections are anticipated to warrant a traffic signal as a result of the Project. Impacts to area intersections and segments would be less than significant as a result of the Project.

Existing Plus Project Average Daily Traffic Volumes - Proposed Project



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Source: Kunzman and Associates, 2021

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VENTANA Specific Plan EIR
Existing Plus Project (E+P) Traffic Volumes
Indio, California

Exhibit
2.18-4

Opening Year (2022) With Project (2022+P) Impacts

2022+P weekday average daily traffic (ADT) volumes are shown in Exhibit 2.18-5. Table 2.18-5 compares intersection operations in the study area in Opening Year (2022) without and with the proposed Project. As shown, the study area intersections are projected to operate at Levels of Service D or better during the peak hours with and without the Project, without improvements to Verano Drive.

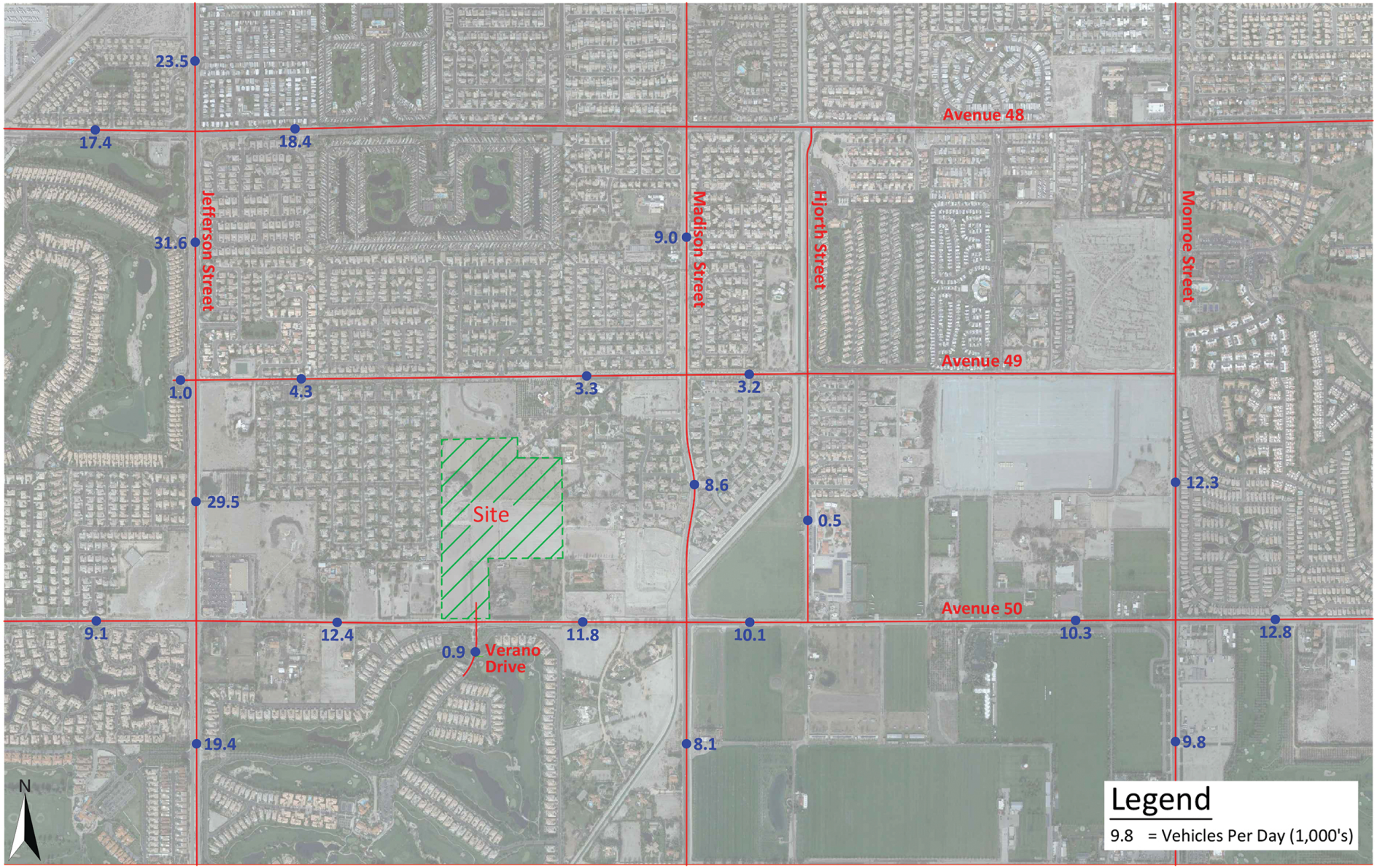
Table 2.18-5
Intersection Analysis for Opening Year (2022) Conditions

Study Intersection	Traffic Control[2]	2022 Without Project				2022 With Project			
		Delay[1] (secs.)		Level of Service		Delay[1] (secs.)		Level of Service	
		AM	PM	AM	PM	AM	PM	AM	PM
1. Jefferson Street / Avenue 48	TS	22.3	29.0	C	C	22.4	29.1	C	C
2. Jefferson Street / Avenue 49	TS	18.5	14.5	B	B	18.5	14.5	B	B
3. Jefferson Street / Avenue 50	TS	25.5	22.0	C	C	25.8	22.3	C	C
4. Verano Drive / Avenue 50									
- Without Improvements	CSS	18.1	19.0	C	C	23.8	26.4	C	D
- With Improvements	CSS	-	-	-	-	20.1	20.2	C	C
5. Madison Street / Avenue 49	AWS	11.7	11.1	B	B	11.8	11.1	B	B
6. Madison Street / Avenue 50	TS	23.5	22.7	C	C	23.5	23.0	C	C
7. Hjorth Street / Avenue 50	CSS	25.2	17.8	D	C	27.3	18.8	D	C
8. Monroe Street / Avenue 50	TS	20.6	18.6	C	B	20.9	18.6	C	B

[1] Per the Highway Capacity Manual, overall average intersection delay and level of service are shown for intersections with a traffic signal or all-way stop control. For intersections with cross street stop control, the delay and level of service for the worst individual movement (or movements sharing a single lane) are shown.
[2] CSS = Cross-street Stop; TS = Traffic Signal; AWS = All Way Stop.
Source: Tables 10 & 13, VENTANA Traffic Impact Analysis, Kunzman Associates, January 25, 2021.

With completion of the Project in its Opening Year, impacts associated with the Project on surrounding intersections will be less than significant. In addition, all roadway segments operate at LOS B or better in the Opening Year (see Table 11 of Appendix K). Impacts of the Project would be less than significant.

Opening Year (2022) With Project Average Daily Traffic Volumes - Proposed Project



02.17.21

Source: Kunzman and Associates, 2021

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VENTANA Specific Plan EIR
Opening Year (2022) With Project Traffic Volumes
Indio, California

Exhibit
2.18-5

Alternative Transportation Planning
The Project includes a bike lane on the north side of Avenue 50 along the Project boundary. Avenue 50 is a future bicycle corridor in the City's General Plan with a planned Class 4 – Cycle Track, for which the Project will provide space in the build out of the half-street of Avenue 50. When the General Plan bike system is complete, residents of the Project will have access to the City's bicycle network from the proposed Project.

The proposed Project will include a sidewalk on Avenue 50, which will be connected to required sidewalks on Avenue 50 as development occurs over time. The Project will therefore implement alternative transportation facilities required in the General Plan, and improve pedestrian safety along Avenue 50. Impacts associated with pedestrian facilities will be beneficial.

Future residents may access SunLine bus service through alternative means such as biking, given the distance between the proposed Project site and current bus stops. In the future, as SunLine routes expand, bus service may be as close as ½ mile from the Project on Jefferson, which would allow direct access to transit for Project residents.

The proposed Project will not conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities. No project-related impact is anticipated.

b) Conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b).

Under SB 743, CEQA Guidelines Section 15064.3 was amended December 2018, stating that vehicle miles traveled (VMT) is the most appropriate measure of transportation impacts. A lead agency may use models or other methods to analyze a project's VMT quantitatively or qualitatively.

General Plan Amendment
The City of Indio has not adopted a VMT policy. In order to analyze General Plan Amendment consistent with the requirements of SB 743 and local conditions, the General Plan Amendment was analyzed under the provisions of the VMT policy adopted by County of Riverside (as revised December 20, 2020). The County's policy includes a comprehensive analysis process that begins with a screening procedure for various types of projects. In the case of single-family homes, the policy's screening criteria has established a threshold of 110 dwelling units or Project GHG emissions less than 3,000 Metric Tons of Carbon Dioxide Equivalent ($MTCO_2e$) (Figure 3 - Screening Criteria for Development Projects). Any project which proposes fewer than 110 single-family homes or that generates less than 3,000 $MTCO_2e$ is presumed to have a less than significant impact on vehicle miles traveled.

The TIA cited additional considerations as follows:

- In order for a project to increase the local vehicle miles of travel, it has to either generate or attract new trips that are greater than the average vehicle miles of travel for the average trip generator or attracter in the area.

- In order for a trip generator to increase the local vehicle miles of travel, it must require that the vehicle trips emanating from it are greater in length than the average vehicle miles of travel for the average trip generator in the area. An example of a development that would increase the average local vehicle miles of travel is a large housing development miles outside of town.

- In order for an attracter to increase the local vehicle miles of travel, it must draw trips in from outside the local area that are greater in length than the average vehicle miles of travel for the average trip attractor in the area. An example of a development that would increase the average local vehicle miles of travel is a regional shopping project.

Based on these criteria, the existing land use designation on the property would result in 45 single family homes, which would be below the threshold of 110 units set in the policy. Therefore, the existing General Plan designation would have a less than significant impact on vehicle miles traveled.

Under the proposed GPA, the Project site would be developed with a maximum of 136 single-family detached residential dwelling units. This site is considered a generator. Development under the GPA would be relatively small and the site is located in the middle of a residential area. The site would not fit the case of a large development located miles out of town, and therefore is not expected to increase the average local vehicle miles of travel. Full buildout of the GPA is projected to generate less than 3,000 Metric Tons of Carbon Dioxide Equivalent ($MTCO_2e$), which is consistent with the GHG projection in Section 2.10.6. It is therefore presumed to cause a less-than significant impact to the local vehicle miles of travel and no further analysis is required per the County VMT policy. Impacts associated with vehicle miles traveled with implementation of the General Plan Amendment would be less than significant.

VENTANA Specific Plan
In order to analyze the Project consistent with the requirements of SB 743 and local conditions, the proposed Project was analyzed under the provisions of the VMT policy adopted by County of Riverside (as revised December 20, 2020).

The Project proposes 103 single-family detached residential dwelling units. While the Project site will generate new trips, it is considered a small project based on the County policy screening criteria as discussed above and the site is located in the middle of a residential area. Because the Project proposes fewer than 110 single-family homes, and will generate less than 3,000 $MTCO_2e$ (please see Section 2.10.6), it will have a less than significant impact on vehicle miles traveled.

c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).

d) Result in inadequate emergency access.

General Plan Amendment

The proposed GPA would create and apply a more intense residential land use designation to the Project site. However, it would not revise or otherwise impact General Plan goals, policies and programs related to traffic hazards and emergency access.

According to the GPU EIR, future development under the General Plan would be required to comply with regulations from the City's roadway engineering standards, Indio Traffic Ordinance, and California Fire Code emergency access requirements. Furthermore, future projects would be reviewed for consistency with GPU policies related to traffic safety and emergency access including Policy ME-2.2, 2.4 & 2.5 on pedestrian and bike safety and Policy ME-1.11 governing the design of residential streets to minimize speeds and provide emergency access connectivity.

All proposed development under the General Plan would be subject to the City's roadway engineering standards and comply with the land uses proposed in the GPU and the zoning code of the City. The City's roadway design standards include specifications for minimum curve radii, sight lines, design speeds, maximum grades, subgrade base, pavement thickness, and other roadway features. These safety reviews in the planning process will avoid any design feature hazards and cause the redesign of any incompatible uses without appropriate mitigation.

Future development facilitated by the proposed General Plan Amendment would still be subject to all General Plan policies and applicable regulations stated above. Compliance with identified regulations and consistency with GPU policies would preclude creation of new traffic hazards, incompatible uses, and inadequate emergency access issues. Impacts under the GPA would be consistent with those identified in the GPU EIR and would be less than significant.

VENTANA Specific Plan

Access to the proposed Project will be provided at Avenue 50. Regional access to the site will be provided via the Highway 111, the I-10 freeway, major arterials, secondary arterials and a variety of local roads. Emergency access has been reviewed by the Fire Department. In a letter dated February 9, 2021 (please see Appendix F), the Fire Department determined that the design of the Project with two 24-foot wide entry drives (one in each direction), provided sufficient emergency access for the Project. Furthermore, prior to construction, both the Fire Department and Police Department will review the site plan to ensure safety measures are addressed, including emergency access and geometric design. No incompatible uses are proposed.

The City's standards require that sight distance be reviewed and approved at the Project's entry onto Avenue 50. On-site traffic signing/striping will be implemented in conjunction with detailed construction plans for the Project site. The City's standard requirement will assure that sight distance is adequate, given that the entry to the Project site is flat, unobstructed and provides views of oncoming traffic. The internal design of streets within the Project provides for slower speeds, and a circular roadway design through the Project. All interior streets have been designed to City standards, and will provide standard road widths throughout the Project. No hazardous conditions will be caused by the design of the internal streets.

Therefore, the proposed Project will not result in inadequate emergency access or increase hazards and impacts will be less than significant.

2.18.7 Mitigation Measures

As described in Section 2.18.9, long term (2040) conditions result in potentially significant impacts at two Project area intersections. In order to reduce these impacts to less than significant levels, the following mitigation measure is required.

TRANS-1 The Project proponent shall pay its fair share of the costs of intersection improvements through the payment of Development Impact Fees (DIF). Additional improvements were determined in the "VENTANA Traffic Impact Analysis," prepared by Kunzman Associates, January 25, 2021 to assure that long term traffic impacts are mitigated to less than significant levels.

The intersection of Verano Drive at Avenue 50 is projected to warrant a traffic signal for Year 2040 with Project traffic conditions. The Project shall be responsible for the cost of installation of the signal. The signal should be constructed once it is warranted.

The intersection of Hjorth Street at Avenue 50 is projected to warrant a traffic signal for Year 2040 without Project traffic conditions. The DIF payment by the Project applicant will be applied towards this intersection improvement.

2.18.8 Significance After Mitigation

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

2.18.9 Cumulative Impacts

General Plan Amendment

As described above, development of a project under the proposed General Plan Amendment would result in 136 units, or 91 more units than currently allowed under the land use designation assigned to the property. The cumulative impacts associated with the General Plan Amendment would be General Plan build out, identified as year 2040 conditions. The Traffic Impact Analysis analyzed cumulative impacts of the proposed General Plan Amendment in Year 2040 (2040+GPA), which represents the circulation system for existing traffic, plus areawide growth, plus full buildout of the General Plan, and would represent cumulative impacts to the transportation system. As shown in Table 15 and 18 of Appendix K, under General Plan build out conditions, all roadway segments operate at LOS D or better, with or without the proposed General Plan Amendment.

In order to assess the cumulative impacts of implementation of the General Plan Amendment, 2040+GPA peak hour traffic operations were evaluated for all study area intersections. As shown in Table 2.18-6, without the implementation of the General Plan Amendment, all intersections would operate at acceptable levels of service, with the exception of the intersection of Avenue 50 and Hjorth, which would operate at LOS F in the morning peak hour. With the addition of the increased density resulting from the GPA, the intersection of Avenue 50 and Hjorth would also operate at LOS F in the morning peak hour. With the installation of a traffic signal, this intersection would operate at LOS A in both the morning and evening peak hour. In addition, and as demonstrated in Table 2.18-6, the implementation of the General Plan Amendment results in unacceptable LOS (E in the morning peak hour and F in the evening peak hour) at the intersection of Avenue 50 and Verano Drive, the access point for the GPA, without improvements. This would represent a significant impact, and requires mitigation. As shown in the Table, with the installation of a traffic signal, this intersection would operate at LOS A in both the morning and evening peak hour.

Cumulative traffic impacts associated with the General Plan Amendment, therefore, would be significant, but can be mitigated with the traffic signal improvements included in Mitigation Measure TRANS-1. With implementation of TRANS-1, cumulative impacts associated with the implementation of the General Plan Amendment would be less than significant.

Table 2.18-6
Intersection Analysis (GPA) for Year 2040 Conditions

Study Intersection	Traffic Control[2]	2040 Without GPA				2040 With GPA			
		Delay[1] (secs.)		Level of Service		Delay[1] (secs.)		Level of Service	
		AM	PM	AM	PM	AM	PM	AM	PM
1. Jefferson Street / Avenue 48	TS	22.3	53.8	C	D	27.5	54.5	C	D
2. Jefferson Street / Avenue 49	TS	27.0	19.6	C	B	27.2	19.7	C	B
3. Jefferson Street / Avenue 50	TS	43.0	27.2	D	C	43.7	27.5	D	C
4. Verano Drive / Avenue 50									
- Without Improvements	CSS	26.9	29.4	D	D	45.4	51.9	<u>E</u>	<u>F</u>
- With Improvements	**TS**	-	-	-	-	4.0	3.4	A	A
5. Madison Street / Avenue 49	AWS	16.5	14.5	C	B	16.5	14.5	C	B
6. Madison Street / Avenue 50	TS	24.3	23.1	C	C	24.3	23.2	C	C
7. Hjorth Street / Avenue 50									
- Without Improvements	CSS	87.9	26.6	<u>F</u>	D	99.9	29.2	<u>F</u>	D
- With Improvements	**TS**	9.7	3.3	A	A	9.7	3.6	A	A
8. Monroe Street / Avenue 50	TS	25.6	20.6	C	C	25.3	20.5	C	C

BOLD shows improvements. <u>Underlined</u> shows unacceptable LOS.

[1] Per the Highway Capacity Manual, overall average intersection delay and level of service are shown for intersections with a traffic signal or all-way stop control. For intersections with cross street stop control, the delay and level of service for the worst individual movement (or movements sharing a single lane) are shown.

[2] CSS = Cross-street Stop; TS = Traffic Signal; AWS = All Way Stop.

Source: Tables 16 & 20, VENTANA Traffic Impact Analysis, Kunzman Associates, January 25, 2021.

VENTANA Specific Plan

The cumulative impact analysis associated with the proposed Project would be General Plan build out, or year 2040 conditions. The Traffic Impact Analysis analyzed cumulative Project impacts in a Year 2040 with Project (2040+P) scenario, which represents the circulation system for existing traffic, plus areawide growth, plus the Project at General Plan build out.

In order to assess the cumulative impacts of implementation of the Project, 2040+P peak hour traffic operations were evaluated for all study area intersections. As shown in Table 2.18-7, without the implementation of the proposed Project, level of service at all study area intersections will be acceptable, with the exception of Avenue 50 and Hjorth Street, which will experience LOS F in the morning peak hour, without improvements. With the addition of the proposed Project, the intersection of Avenue 50 and Hjorth still fails, and the intersection of Avenue 50 and Verano Drive, the Project entrance, also experiences unacceptable LOS. In both cases, with the installation of a traffic signal, as shown in the Table, both intersections will operate at LOS D or better, which is consistent with the City's standard for acceptable LOS operations.

As provided in Mitigation Measure TRANS-1, the Project will be contributing towards these intersection improvements through the payment of DIF and the payment of costs associated with construction of the traffic signal at the Avenue 50/Verano Drive intersection.

With the implementation of mitigation measure TRANS-1, impacts of the proposed Project would not be cumulatively considerable and would be less than significant.

Table 2.18-7
Intersection Analysis (Proposed Project) for Year 2040 Conditions

Study Intersection	Traffic Control[2]	2040 Without Project				2040 With Project			
		Delay[1] (secs.)		Level of Service		Delay[1] (secs.)		Level of Service	
		AM	PM	AM	PM	AM	PM	AM	PM
1. Jefferson Street / Avenue 48	TS	22.3	53.8	C	D	27.4	54.3	C	D
2. Jefferson Street / Avenue 49	TS	27.0	19.6	C	B	27.2	19.7	C	B
3. Jefferson Street / Avenue 50	TS	43.0	27.2	D	C	43.4	27.4	D	C
4. Verano Drive / Avenue 50									
- Without Improvements	CSS	26.9	29.4	D	D	40.6	46.6	<u>E</u>	<u>E</u>
- With Improvements	**TS**	-	-	-	-	8.5	4.0	A	A
5. Madison Street / Avenue 49	AWS	16.5	14.5	C	B	16.5	14.5	C	B
6. Madison Street / Avenue 50	TS	24.3	23.1	C	C	24.2	23.2	C	C
7. Hjorth Street / Avenue 50									
- Without Improvements	CSS	87.9	26.6	<u>F</u>	D	99.9	28.6	<u>F</u>	D
- With Improvements	**TS**	9.7	3.3	A	A	9.7	3.5	A	A
8. Monroe Street / Avenue 50	TS	25.6	20.6	C	C	25.3	20.4	C	C

BOLD shows improvements. <u>Underlined</u> shows unacceptable LOS.

[1] Per the Highway Capacity Manual, overall average intersection delay and level of service are shown for intersections with a traffic signal or all-way stop control. For intersections with cross street stop control, the delay and level of service for the worst individual movement (or movements sharing a single lane) are shown.

[2] CSS = Cross-street Stop; TS = Traffic Signal; AWS = All Way Stop.

Source: Tables 16 & 19, VENTANA Traffic Impact Analysis, Kunzman Associates, January 25, 2021.

2.19 Tribal Cultural Resources

2.19.1 Introduction

This section evaluates the potential for the proposed Project to result in adverse impacts to Native American tribal cultural resources. Mitigation measures to reduce impacts to a less than significant level are identified, where appropriate. This section is based primarily on the City of Indio General Plan and EIR, and the Cultural Resources Survey report prepared for the Project by ASM Affiliates Inc. (ASM, 2020)[1], which is Appendix D of this EIR.

2.19.2 Thresholds of Significance

Tribal Cultural Resources

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

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

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

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

2.19.3 Regulatory Framework

State

California Public Resources Code

The California Environmental Quality Act (CEQA) is the principal statute governing the environmental review of projects within the State. The State of California's Public Resources Code (PRC) establishes the definitions and criteria for "historical resources," which require similar protection to what the NHPA mandates for historic properties. According to PRC Section

[1] "Cultural Resources Study for the Avenue 50 Indio Project, Indio, Riverside County, California," prepared by ASM Affiliates, Inc., March 13, 2020.

5020.1(j), an "historical resource includes, but is not limited to, any object, building, site, area, place, record, or manuscript which is historically or archaeologically significant, or is significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California."

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

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

Senate Bill 52

Senate Bill (SB) 18 recognizes that protection of traditional tribal cultural places is important to all tribes, whether federally recognized or not, and it provides all California Native American tribes with the opportunity to participate in consultation with city and county governments for this purpose (Governor's Office of Planning and Research [OPR] 2005). SB 18 establishes responsibilities for local governments to contact, provide notice to, refer plans to, and consult with tribes. The following list briefly identifies the contact and notification responsibilities of local governments, in sequential order of their occurrence:

- Prior to the adoption or any amendment of a general plan or specific plan, a local government must notify the appropriate tribes (on the contact list maintained by the NAHC) of the opportunity to conduct consultations for the purpose of preserving or mitigating impacts to cultural places located on land within the local government's jurisdiction that is affected by the proposed plan adoption or amendment. Tribes have 90 days from the date on which they receive notification to request consultation, unless a shorter timeframe has been agreed to by the tribe (Government Code §65352.3).
- Prior to the adoption or substantial amendment of a general plan or specific plan, a local government must refer the proposed action to those tribes that are on the NAHC contact list and have traditional lands located within the city or county's jurisdiction. The referral must allow a 45-day comment period (Government Code §65352). Notice must be sent regardless of whether prior consultation has taken place. Such notice does not initiate a new consultation process.
- Local governments must send notice of a public hearing, at least 10 days prior to the hearing, to tribes who have filed a written request for such notice (Government Code §65092).

On or after March 1, 2005, local governments must consult with tribes that have requested consultation in accordance with Government Code §65352.3. The purpose of this consultation is to preserve or mitigate impacts to cultural places that may be affected by a general plan or specific plan amendment or adoption.

SB 18 also amended Civil Code Section 815.3 and adds California Native American tribes to the list of entities that can acquire and hold conservation easements. Tribes on the contact list maintained by the NAHC now have the ability to acquire, on terms mutually satisfactory to the tribe and the landowner, conservation easements for the purpose of protecting their cultural places (OPR 2005).

Assembly Bill 52

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

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

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

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

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

Local

City of Indio General Plan

The General Plan Conservation Element includes policies to ensure that impacts to tribal cultural resources are taken into consideration and reduced or minimized in conjunction with future development. Relevant policies include the following:

Policy CE-8.4 Monitoring. Require monitoring on sites where grading has the potential to impact subsurface cultural and paleontological resources during excavation and construction activities.

Policy CE-8.6 Coordination with Local Tribes. Periodically meet with representatives from local tribes to:

- Obtain input prior to making decisions, taking actions, or implementing programs/projects that may impact cultural resources;
- Discuss methods to preserve and protect highly sensitive cultural resources; and
- Ensure that there is agreement regarding the protocol to be followed when cultural resources are discovered.

2.19.4 Environmental Setting

The Cahuilla people settled in the Coachella Valley approximately 2,000 to 3,000 years ago and lived on hunting and gathering under varying environmental conditions. They are generally divided into three groups by geographic setting: the Pass Cahuilla of the San Gorgonio Pass–Palm Springs area, the Mountain Cahuilla of the San Jacinto and Santa Rosa Mountains and the Cahuilla Valley, and the Desert Cahuilla of the eastern Coachella Valley. Amid the desert and mountains, the Holocene Lake Cahuilla provided abundant resources to nearby settlements. The Cahuilla hunted waterfowl and utilized elaborate stone fish traps when the lake was present, and relied on more terrestrial resources when it dried out and retreated. They hunted deer, antelope, bighorn sheep, rabbits, and wood rats with throwing sticks, clubs, nets, traps, and snares, as well as bow and arrow. A variety of lithic tools such as mortar and pestle, fire drill, awl, stone knives and scrapers and containers like baskets and pottery vessels as well as wood, horn, and bone spoons and stirrers were employed in their subsistence.

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

2.19.5 Existing Conditions

The areas of highest archaeological resources in the City are known to occur within the ancient Lake Cahuilla shoreline. The Project site lies within the ancient Lake Cahuilla boundary. Although archaeological resources are much more likely to be encountered in undeveloped parcels of land, subsurface archaeological resources may be encountered in areas that have been developed or farmed but have not been subject to extensive subsurface disturbance or excavation.

Historical Records Search

On February 24 and March 2, 2020, ASM completed a records search at the Eastern Information Center (EIC), University of California, Riverside. The search was focused on a one-mile radius from the Project area and identified 66 previous reports that addressed areas within that radius. None of these reports address areas that intersect with or overlap the Project area. EIC records indicate the presence of 73 previously recorded cultural resources outside of, but within a one-mile radius of the Project area. These resources consist predominantly of prehistoric sites or isolates consisting of three or less artifacts. Most of the prehistoric sites are characterized by sparse surficial, as well as sparse and relatively shallow subsurface deposits, many of which have been disturbed or destroyed by modern construction and development activities. Some remnants of historic debris scatter also occur infrequently within a one-mile radius of the Project area. These resources require no further consideration in the CEQA-compliance process for this Project due to their distance from the site and low cultural significance.

The California Register of Historic Resources (CRHR) and the National Register of Historic Places (NRHP) were also examined to identify any previously recorded cultural resources within one mile of the Project area. No historical addresses were identified as occurring within the one-mile records search radius.

Field Survey

On March 4, 2020, a field survey of the Project site was conducted by ASM archaeologists and a Native American monitor from the Torres-Martinez Desert Cahuilla Tribe. The majority of the site has been previously disturbed by agricultural use and recent plowing and blading. Large portions of the ground surface in the Project area were obscured by vegetation dominated by invasive grasses. Highly fragmented ceramics and glass were sparsely distributed on the ground surface throughout the entire Project area and appear to be modern in nature. No buildings, structures, objects, sites, features, or artifacts of prehistoric or historical origin were encountered within the Project area during the field survey.

Native American Participation

On February 6, 2020, ASM submitted a written request to the State of California Native American Heritage Commission (NAHC) for a records search in the Sacred Lands File. NAHC responded with a letter on February 21, 2020 stating that a search of the Sacred Lands File was negative but recommended contacting nineteen local tribal authorities regarding potential Native American Cultural resources. The City conducted Tribal Consultation in conformance with both SB 18 and AB 52 requirements, as detailed below.

2.19.6 Project Impacts

Would the Project:

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

General Plan Amendment
According to the GPU EIR, the City of Indio General Plan Update Draft Historic Resources Survey identified known historic resources, potential historic districts and local conservations zones, which are clustered in the center of the City. There were no identified tribal cultural resources in the Project area or vicinity. Therefore, no impact would occur on the Project site regarding the significance of a tribal historic resource that is eligible for listing in the California Register of Historical Resources or in a local register of historical resources regardless the land use designation. The General Plan Amendment will disturb the same area as that considered in the GPU EIR, and the intensity of development on that land has no bearing on the potential for tribal cultural resources to occur. The proposed GPA would result in no new impact compared to that analyzed in the GPU EIR.

VENTANA Specific Plan
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 are known to occur onsite. As explained in Section 2.7.6.a) and above, the site-specific cultural resources study determined that the Project site contains no historical resources pursuant to CEQA § 15064.5. The proposed Project area is not identified by the GPU EIR as a potential historic district or conservation zone. 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.

General Plan Amendment
As stated in the GPU EIR, land disturbance and/or development associated with implementation of the General Plan could result in the accidental destruction or disturbance of known or as yet unidentified sacred uses/tribal cultural resources should construction activities such as grading and excavation occur on sites of tribal significance, including sacred lands, archaeological sites, or sites containing human remains. The General Plan Conservation Element includes policies to ensure that impacts to tribal cultural resources are taken into consideration and reduced or minimized in conjunction with future development through monitoring (Policy CE-8.4) and coordination with local tribes (Policy CE-8.6). These policies would guide future development, such that significant tribal cultural resources are avoided and, if avoidance is not possible, that

measures to mitigate significant impacts are implemented in accordance with CEQA. All future development would be required to comply with applicable federal and state laws and regulations that concern the preservation of tribal cultural resources, including the California Public Resources Code, the National Historic Preservation Act, and CEQA.

Consultation with Native American tribes was conducted pursuant to SB 18 and AB 52 in the General Plan Update process. No sacred uses/tribal cultural resources have been identified in Tribal communications. Future discretionary actions requiring a General Plan Amendment, Specific Plan Amendment or rezone would likewise be required to undergo the SB 18 and AB 52 consultation process, which requires a consultation process with a California Native American tribe, if requested, that is traditionally and culturally affiliated with the geographic area of the specific proposed development project. As future projects are planned, they must adhere to applicable GPU policies and regulations including National Historic Preservation Act and California Public Resources Code. The City conducted Tribal consultation as part of the GPA and Project review, as described below. Therefore, potential impacts to tribal cultural resources associated with growth accommodated by the General Plan Amendment would be less than significant.

The new land use designation and future projects on the Project site under the proposed GPA would both be subject to General Plan policies and applicable regulations to ensure impacts are less than significant regarding resources of significance to a Native American tribe. No new impact would result from the proposed GPA, and impacts would remain less than significant.

VENTANA Specific Plan

AB 52 and SB 18 require that the consultation process between local and tribal governments begin prior to the release of an environmental impact report, negative declaration, or mitigated negative declaration. On June 26, 2020, the City of Indio distributed AB 52 and SB 18 consultation letters for the proposed Project to 21 Native American tribes identified by the NAHC as having traditional lands or cultural places within City boundaries. Copies of the letters are provided in Appendix D. Three Tribes requested consultation, and meetings or phone calls were held with:

- Agua Caliente Band of Cahuilla Indians (ACBCI) on August 10, 2020
- Campo Band of Mission Indians (CBOMI) August 1, 2020
- Torres Martinez on October 1, 2020

All three Tribes requested that Tribal monitors be present during earth moving activities. Mitigation Measure CUL-1 addresses this request. The Campo Band also requested that bone testing be conducted should human remains be located on the site. Although there is no evidence that human remains could occur on-site, Health and Safety Code Section 7050.5 and Public Resource Code Section 5097.9 require that if they are identified during earth moving activities, all activities must cease, the County Coroner must be called, he/she must contact the NAHC, who must contact the most likely descendant if the remains are believed to be Native American. The most likely descendant in this case would not be of the Campo Band, but of one of the existing

Coachella Valley Bands, including either the Torres Martinez or the ACBCI. The Tribe consulted would determine their preferred process for internment in the Tribal tradition. This requirement of law assures that the impacts associated with the Project will remain less than significant.

With implementation of Mitigation Measures CUL-1, potential impacts to resources of significance to Native American tribes would be less than significant.

2.19.7 Mitigation Measures

See Section 2.7.7.

2.19.8 Significance After Mitigation

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

2.19.9 Cumulative Impacts

The study area for the GPU EIR (page 5-11) assessment of cumulative impacts to tribal cultural resources was the entire Riverside County. The EIR determined that future development facilitated by the General Plan could have a cumulative impact on tribal cultural resources through the loss of records or artifacts as land is developed. However, adverse effects would be reduced through compliance with AB 52, SB 18 and General Plan policies, and review by the City and other relevant agencies. Impacts would be reduced such that the General Plan's contribution to cumulative tribal cultural resource impacts would not be cumulatively considerable. Development of the Project site was part of the GPU EIR's analysis and conclusion. Regardless of the intensity of development proposed, the General Plan Amendment and proposed Project affect the same parcels of land as those addressed in the GPU EIR, and would have the same impact on this resource as development under the current General Plan land use designation, since the site will require grading and excavation regardless of the intensity of development. Therefore, as was found in the GPU EIR, the impacts of the proposed Project, when considered with the impacts of all other projects undertaken within the City, would result in less than significant cumulative impacts on tribal cultural resources.

2.20 Utilities and Service Systems

2.20.1 Introduction

This section of the EIR discusses potential impacts to utilities and service systems, including water supply, wastewater and sewer service, storm drainage, and solid waste disposal resulting from implementation of the proposed Project. A wide range of available resources, including the City's General Plan and IWA, IID, and Burrtec published documents and annual reports, have been used in researching and analyzing the Project and its potential effects. These include detailed analysis of existing utility lines and future extensions and conditions.

2.20.2 Thresholds of Significance

According to CEQA Guidelines Appendix G, the proposed Project would have significant impacts on utilities and service systems if it would:

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.

b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years.

c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments.

d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals.

e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste.

2.20.3 Regulatory Framework

Federal

No federal regulations relative to utilities and service systems would be applicable to the proposed Project.

State

California Integrated Waste Management Act of 1989

The California Integrated Waste Management Act of 1989 (Public Resources Code, Division 30), enacted through Assembly Bill (AB) 939 and modified by subsequent legislation, required all California cities and counties to implement programs to reduce, recycle, and compost at least 50 percent of wastes by the year 2000 (Public Resources Code Section 41780). CalRecycle determines compliance with this mandate to divert generated waste, including both disposed and diverted waste.

In 2007, Senate Bill (SB) 1016 amended AB 939 to establish a per capita disposal measurement system. The per capita disposal measurement system is based on a jurisdiction's reported total disposal of solid waste divided by its population. California's Integrated Waste Management Board sets a target per capita disposal rate for each jurisdiction. Each jurisdiction must submit an annual report to California's Integrated Waste Management Board with an update of its progress in implementing diversion programs and its current per capita disposal rate.

California Assembly Bill 341

In October 2011, Assembly Bill 341 was signed into law, setting a 75% recycling goal for California by year 2020. The legislation mandates that all California commercial or public entities that generate 4 or more cubic yards of solid waste per week, and multifamily dwellings of 5 or more units, must arrange recycling services by and following July 1, 2012. Individual jurisdictions determined compliance measures and due dates. Per Public Resources Code Section 41821 (annual reporting), each jurisdiction is required to electronically report the progress achieved which is reviewed by CalRecycle.

CALGreen Code

CALGreen Code Section 4.408.1 (construction waste management) mandates recycle and/or salvage for reuse a minimum of 65 percent of the nonhazardous construction and demolition waste in accordance with Section 4.408.2. Section 4.408.2 (construction waste management plan) requires a construction waste management plan submitted for the project, signed by the owner, in conformance with Items 1 through 5 prior to issuance of a building permit. The construction waste management plan shall be updated as necessary upon approval by the enforcing agency and shall be available during construction for examination by the enforcing agency.

Senate Bill 221

SB 221, enacted in 2001 and codified in Government Code Section 66473.7, requires a county, city, or local agency to include a condition to any tentative subdivision map that a sufficient water supply will be available to serve the subdivision. The term "sufficient water supply" is defined as the total water supplies available during a normal year, single dry year, and multiple dry years within a 20-year projection that would meet the proposed subdivision's projected water demand, in addition to existing and planned future water uses, including agricultural and industrial uses, within the specified service area. SB 221 further requires any verification of

"projected" water supplies to be based on entitlement contracts, capital outlay programs, and regulatory permits and approvals. The Project does not meet the threshold for the preparation of a verification.

Regional and Local

Riverside County Integrated Waste Management Plan

The Countywide Integrated Waste Management Plan (CIWMP) was prepared in accordance with the California Integrated Waste Management Act of 1989. To attain the reduction goals, AB 939 established a planning hierarchy utilizing new integrated solid waste management practices.[1] Riverside County revises the CIWMP every five years and publishes a Five-Year Review Report to assure that the County's waste management practices remain consistent with the hierarchy of waste management practices.

City of Indio General Plan

The City of Indio General Plan includes overarching goals and policies to support effective wastewater treatment facilities, promote water conservation, promote recycling and reuse and support solid waste diversion from landfills. Relevant policies are found in the Land Use and Urban Design, Infrastructure and Public Facilities, and Conservation Elements.

Infrastructure and Public Facilities Element

Goal IE-1 Surface and Subsurface Water. Surface and subsurface water resources that meet or exceed established water quality standards.

Policy IE-1.1 Water supply. Work with CVWD and IWA to ensure an adequate supply of domestic water facilities to sustain existing and projected water needs.

Policy IE-1.2 Water facilities. Ensure adequate funding is available to accommodate existing and future water facilities.

Goal IE-2 Storm Drain and Flood Control. Well-designed storm drain and flood control facilities that benefit the community and protect sensitive streams and watercourses.

Policy IE-2.1 Facility capacity. Ensure that local storm drain and flood control facilities are designed with sufficient capacity to protect the public and property from stormwater damage.

[1] Riverside County Department of Waste Resources Website, http://www.rcwaste.org, accessed February 2021.

Policy IE-2.6 Stormwater facility design. Design storm drain facilities to allow for infiltration, evapotranspiration, or reuse of stormwater on the site where it is generated to the extent practical.

Goal IE-3 Wastewater Collection. Wastewater facilities that effectively collect and treat wastewater.

Policy IE-3.2 Wastewater Facility Funding. Ensure that adequate funding is available to maintain and improve existing facilities as well as construct new infrastructure as needed.

Policy IE-3.3 Sustainable Wastewater Systems. Continue to provide innovative and sustainable wastewater systems, such as the biological wetlands at the Coachella Valley Wild Bird Center, that both treat wastewater and serve as habitat for waterfowl and shorebirds.

Policy IE-3.4 Greywater Systems in New Development. Encourage new residential development to provide easy implementation of greywater systems that redirect water from washbasins, showers, and tubs for use in toilet flushing, irrigation, and other non-potable uses.

Goal IE-6 Solid Waste and Recycling. Maximum diversion of solid waste from landfills through the reduction, reuse, and recycling of materials.

Policy IE-6.8 Recycled Building Material. Encourage the use of recycled building and infrastructure materials in new public and private development.

Land Use and Urban Design Element

Policy LU-12.2 Adequate Infrastructure. Ensure adequate infrastructure and utility service levels before approving new development.

Conservation Element

Goal CE-2 Water Conservation. Sustainable domestic water facilities and water conservation measures to effectively meet current and future demand.

Policy CE-2.3 New development requirements. Require new development projects to implement water conservation measures that are equivalent to or exceed CalGreen Tier One or other applicable standards in effect at the time of development.

Policy CE-2.4 Drought-tolerant landscaping. Exceed State landscaping water efficiency standards by requiring the use of drought tolerant landscaping, minimizing the use of turf, and encouraging the retrofitting of existing irrigation systems.

Policy CE-7.6 Native plants. Incorporate native desert plant materials into new development projects to the extent possible and feasible.

2.20.4 Environmental Setting

The Project area is well connected to the utilities network and served by the following providers:

Utility	Service Provider(s)
Electricity	Imperial Irrigation District (IID)
Natural gas	Southern California Gas (SoCalGas)
Water	Indio Water Authority (IWA)
Wastewater	Coachella Valley Water District (CVWD)
Solid waste	Burrtec
Telecommunications	Charter Spectrum, Frontier

2.20.5 Existing Conditions

Domestic Water

The City currently has five water sources: groundwater from the Coachella Valley Whitewater Subbasin; Colorado River water; State Water Project water; recycled water; and surface water. Groundwater has been the principal source of urban water supply in the Coachella Valley since the early part of the twentieth century. The majority of City of Indio is served by Indio Water Authority (IWA) for potable water, and the remainder is served by CVWD.

Water supplies for the City of Indio are primarily from the lower aquifer in the Lower Whitewater River Subbasin. Because the Whitewater River Basin is an un-adjudicated basin, IWA does not hold specific water rights, but rather pumps supplies from the aquifer as needed to meet demands within its service area. IWA has initiated an Integrated Regional Water Management Plan (IRWMP), which aims to address the Coachella Valley's current and future water needs paying specific attention to overdraft issues, water supply management, environmental and economic impacts, compliance with state and federal guidelines and long-term sustainability. IWA works with CVWD to manage the underground water basins. IWA and CVWD have access to or are working to obtain other water supply sources to meet projected water needs and help eliminate groundwater overdraft.

The Project site is located within the IWA service area for domestic water. IWA has approximately 23,000 service connections, 328 miles of 18 " and 24" transmission pipelines, and monitors and maintains 3,379 fire hydrants, 7 storage tanks, 6 booster pump stations, and 20 well sites.[2] Water supplies for the City of Indio are primarily from the lower aquifer in the Lower Whitewater River Subbasin. Because the Whitewater River Basin is an un-adjudicated basin, IWA does not hold specific water rights, but rather pumps supplies from the aquifer as needed to meet demands within its service area. IWA currently has a total pumping capacity of 74,600 acre-feet per year (AFY), and its average baseline water demand in 2015 was 18,208 AFY. [3]

Wastewater Service

Two wastewater treatment plants serve the City: The one owned by Valley Sanitary District (VSD) treats approximately 96 percent of Indio's wastewater; and the other owned by CVWD treats the remaining. The Project site is located in the CVWD service area for wastewater treatment.[4] CVWD owns and maintains a wastewater treatment facility (WRP-7) located at Avenue 38 and Madison Street. WRP-7 is a tertiary treatment facility with a capacity of 5 million gallons per day (mgd); the effluent produced is recycled for nonpotable uses. CVWD is implementing expansions and improvement to its wastewater collection system and reclamation plants throughout the Coachella Valley. CVWD implements all applicable requirements of the Regional Water Quality Control Board (RWQCB) pertaining to water quality and wastewater discharge.

Floodplain Management

In the City of Indio, local drainage facilities generally convey runoff from local streets and lots to the regional facilities. The local storm drain system consists of gutters, engineered storm drains, and channels. There are limited existing storm drainage facilities in the City. Regional drainage is managed by the Coachella Valley Water District, which maintains the Coachella Valley Stormwater Channel and the La Quinta Evacuation Channel.

Electricity

The Project site is located within the Imperial Irrigation District (IID) service area which covers 6,611 square miles, including all of Imperial County along with parts of Riverside and San Diego counties. As of December 2019, IID serves 156,715 electric accounts with 4,404 miles of overhead distribution and 1,744 miles underground.[5] IID generates power from a variety of energy sources, including natural gas, large hydroelectric, nuclear, and renewable sources

[2] IWA website, https://www.indio.org/your_government/water/about_us/default.htm, accessed February 19, 2021.
[3] 2015 Urban Water Management Plan Final Report, prepared for Indio Water Authority, July 1, 2016.
[4] CVWD Sanitation Boundaries Map, June 20, 2013, www.cvwd.org; Valley Sanitary District Boundary Map, www.valley-sanitary.org, September 24, 2019.
[5] Imperial Irrigation District's Annual Report 2019, full financial version published November 17, 2020.

(which include small hydroelectric, solar, geothermal, biomass, and waste sources).[6] According to the Indio Climate Action Plan, the City's 2010 electricity consumption was 644,035,000 kWh.[7] IID has extensive transmission and subtransmission lines in Indio.

Natural Gas

Natural gas is provided to the City of Indio by the Southern California Gas Company (SoCalGas). The service territory of SoCalGas encompasses approximately 24,000 square miles in diverse terrain throughout central and southern California, from the City of Visalia to the Mexican border.[8] SoCalGas receives gas supplies from several sedimentary basins in the western United States and Canada, as well as local California supplies.[9] 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 Indio Climate Action Plan, city-wide natural gas consumption totaled 1,117,040 therms in 2010.[10] This includes natural gas consumed by residential, commercial, and industrial land uses.

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 Frontier.

Solid Waste Management

Residential and commercial areas in the City of Indio are served by Burrtec Waste and Recycling Services. Residential garbage and recyclables are collected on a weekly basis and taken to the Coachella Valley Transfer Station in Coachella, which currently has a permitted maximum tonnage of 1,100 tons per day (tpd) of solid waste and a maximum capacity of 12,685 cubic yards per day. The facility can receive agricultural, construction and demolition, green material, industrial, inert, metal, mixed municipal, and tire wastes. At the Coachella Valley Transfer Station, waste enters the Riverside County waste stream, is sorted, and sent to one of the Riverside County landfills (Badlands, Blythe, Desert Center, El Sobrante, Lamb Canyon, and Oasis), which have an estimated remaining combined capacity of 183,364,582 cubic yards.[11]

[6] IID Power Content Label, https://www.iid.com/energy/renewable-energy/power-content-label, accessed February 2021.

[7] Indio Climate Action Plan, adopted September 18, 2019.

[8] SoCalGas, Company Profile, https://www.socalgas.com/about-us/company-profile, accessed February 2021.

[9] 2014 California Gas Report, California Gas and Electric Utilities. SoCalGas website, https://www.socalgas.com/regulatory/documents/cgr/2014-cgr.pdf, accessed February 2021.

[10] Indio Climate Action Plan, adopted September 18, 2019.

[11] CalRecycle Solid Waste Information System (SWIS), https://www2.calrecycle.ca.gov/SolidWaste/Site/Search, accessed February 19, 2021.

2.20.6 Project Impacts

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.

General Plan Amendment

The proposed General Plan Amendment would change the land use designation on the Project site from Desert Estates Neighborhood (up to 1 du/ac) to Transitional Neighborhood (0-3 du/ac), thereby increasing the development potential on the subject property from a maximum buildout of 45 dwelling units to 136 dwelling units, an increase of 91 units. It would also revise the General Plan land use map and text accordingly. Amendments would apply only to the subject property.

Domestic Water Supply

As discussed in Section 2.12, Hydrology and Water Quality, the water demand of the 91 additional dwelling units facilitated by the proposed General Plan Amendment is estimated at 14.07 acre-feet per year. This assumption is based on full buildout of the GPA to provide a conservative analysis and represents less than 0.08% of IWA's 2015 water demand (18,208 AFY). The proposed General Plan Amendment represents a minimal increase in density compared to the current designation (1 DU/AC to 3 DU/AC) on which, in part, the IWA based its future water demand analysis when preparing its Urban Water Management Plan.

The GPU EIR did not quantify projected water usage anticipated at General Plan buildout, but demonstrated that IWA has adequate supplies to meet demands during normal, single dry, and multiple dry years through 2040 (GPU EIR Table 4.16-2). It determined that coordination between the City, IWA, CVWD, and other water purveyors, compliance with state and federal guidelines, adherence to General Plan policies pertaining to water usage and conservation, and compliance with City water conservation standards would ensure adequate system capacity to meet the City's future needs. The GPU EIR determined that impacts related to water supply would be less than significant. Future development on the Project site under the GPA will be required to implement all water conservation measures imposed by IWA under both normal and drought conditions over the life of the proposed Project, and will be required to comply with all GPU policies and City standards pertaining to water usage and conservation. Therefore, the proposed GPA impacts associated with domestic water demand are expected to be less than significant.

Domestic Water Infrastructure

The GPU EIR (page 4.16-20) stated that growth accommodated by the GPU may necessitate construction of new water facilities over the plan's horizon. However, there is existing domestic water infrastructure within the subject site vicinity, including 18-inch irrigation laterals under Avenue 50 and north of the site boundary and an existing 8-inch water main north of the subject site. Regardless of whether the site is designated Desert Estates Neighborhood or Transitional Neighborhood, future development on the site can be expected to connect to the existing water lines and would not necessitate the construction of new wells or additional water infrastructure.

As stated in the GPU EIR, buildout of the GPU would have a less than significant impact on water facilities with adherence to General Plan policies and City standards pertaining to water infrastructure. Policy LU-12.2, in particular, would ensure that utility service levels for development projects are accommodated for prior to approval. The proposed GPA does not propose new or revised goals, policies, or programs pertaining to utilities and services and would have no impact on existing General Plan goals, policies, or programs, including Policy LU-12.2. Future development under the GPA would still be subject to General Plan policies and City development standards. Potential GPA impacts would be consistent with those identified in the GPU EIR and less than significant.

Wastewater Treatment

The Project site is served by CVWD for wastewater collection and treatment services. The Project site does not currently contain any wastewater infrastructure. Future development under the GPA will require construction of on-site sewer infrastructure to connect to the existing sewer mains located under Avenue 50 rights-of-way and along the southerly site boundary. Sewage will be conveyed to the CVWD wastewater treatment plant (WRP-7) located at Avenue 38 and Madison Street.

Compared to buildout under the current General Plan designation, buildout of the GPA will allow an additional 91 dwelling units and generate an additional 18,200 gallons of wastewater per day (based on 200 gallons per day for a four-person residence[12]). The WRP-7 treatment capacity is 5 million gallons per day; therefore, additional wastewater generation at buildout of the GPA would account for less than 0.4% of the treatment capacity. In 2015, WRP-7 treated 3,018 acre-feet of wastewater, which is equivalent to approximately 53.9% of its capacity.[13] Therefore, WRP-7 has adequate capacity available to serve the Project and its existing commitments.

The GPU EIR (p. 4.16-18) determined that local wastewater facilities would be adequate to serve the community at General Plan buildout, and the growth accommodated by the GPU would not exceed the requirements of the Regional Water Quality Control Board. The GPA

[12] Coachella Valley Water District Sewer Service Rate Study Report, prepared by Stantec, May 16, 2017.
[13] 2015 Urban Water Management Plan Final Report, prepared for Coachella Valley Water District, July 1, 2016.

would only lightly increase the residential density on the Project site, and wastewater discharges will be typical of residential uses and would not exceed wastewater treatment requirements of the CVWD or RWQCB. Future wastewater generation on the Project site under the GPA 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.

Drainage System

Grading and ground surface alterations will occur at buildout of the Project site whether the site is designated as Desert Estates Neighborhood (current) or Transitional Neighborhood (proposed). The proposed GPA would increase the residential density on the Project site, and would increase the amount of impervious surfaces and runoff quantities. The GPA does not propose new or revised goals, policies, or programs pertaining to utilities and services and would have no impact on existing General Plan goals, policies, or programs.

According to the GPU EIR (page 4.16-23), future development consistent with the GPU would involve grading or alteration of existing site conditions that would affect site runoff. Future development projects would be required to prepare grading and site drainage plans consistent with City and RWQCB requirements. The City would likely require a site-specific drainage report for future development on the Project site, which would analyze project drainage and storm water flows and identify necessary storm water improvements subject to City approval. Future projects would be responsible for adding or upgrading infrastructure to serve the subject site as required in the drainage report recommendations, conditions of project approval, and mitigation required under CEQA. Future development under the GPA would also be subject to Section 55.26 of the Municipal Code, which requires new development to control the rate and volume of storm water runoff and install storm water infrastructure such as retention structures, subsurface areas, cisterns or other structures, where necessary as determined by the City Director of Public Works or designee.

As concluded in the GPU EIR, future development projects would be required to comply with the regulatory requirements of the RWQCB, Indio Municipal Code, and CEQA, thereby effectively controlling storm water runoff. Impacts of General Plan buildout on storm water drainage systems would be less than significant. Increased development facilitated by the proposed GPA would result in marginal runoff increases but they would be adequately controlled through implementation of the same policies and regulatory requirements. Therefore, impacts associated with storm water facilities as a result of the GPA would be consistent with those identified in the GPU EIR and would be less than significant.

Electricity

As discussed in Section 2.8 (Energy Resources) of this EIR, the additional 91 dwelling units that would be facilitated under the proposed GPA would result in an estimated 793,199 kWh of electricity per year at build out. This represents 0.12% of 2010 City-wide kWh usage and a marginal increase in local electricity consumption.

Whether future development on the Project site occurs according to the current General Plan land use designation (Desert Estates Neighborhood) or the proposed GPA (Transitional Neighborhood), it would be subject to General Plan policies and other applicable regulations to ensure efficient use of electricity. In the Project site vicinity, IID has existing facilities aboveground on the north side of Avenue 50 and underground on the south side. Future development under the GPA will require parcel-level connections from the Project site to these existing facilities. Development will comply with applicable IID guidelines regarding installation, extensions, and connections to limit impacts to electricity infrastructure and avoid service interruptions. Future buildout per the proposed GPA will not necessitate the addition or expansion of electric power facilities. Impacts will be less than significant.

Natural Gas

As discussed in Section 2.8 (Energy Resources) of this EIR, the additional 91 dwelling units that would be facilitated by the proposed GPA would result in an estimated 27,843 therms of natural gas per year at build out. This represents less than 2.5% of 2010 City-wide therm usage and a marginal increase in local natural gas usage.

Whether future development on the Project site occurs according to the current General Plan land use designation (Desert Estates Neighborhood) or the proposed GPA (Transitional Neighborhood), it would be subject to General Plan policies and other applicable regulations to ensure efficient use of natural gas. The closest gas lines to the Project site are located underground on the south side of Avenue 50. Future development under the GPA will require parcel-level connections from the Project site to these existing facilities. Prior to ground disturbance, future project contractors would notify and coordinate with SoCalGas to identify the locations and depths of all existing gas lines and avoid disruption of gas service. The proposed GPA will not necessitate the addition or expansion of natural gas facilities. Impacts will be less than significant.

Telecommunications

Future development on the Project site will require local connections to the existing Frontier Communications and Spectrum infrastructure in the Project area. The proposed GPA will facilitate the development of 91 more dwelling units than the current GPU and generate a proportional increase in demand for telecommunication services. However, it would not increase demand such that the addition or expansion of telecommunication facilities would be required. Impacts will be less than significant.

VENTANA Specific Plan

Domestic Water Supply

As discussed in Section 2.12, Hydrology and Water Quality, the total water demand for the proposed Project is estimated at 32.99 acre-feet per year at buildout. The proposed Project represents a minor increase in density compared to the original land use designation (1 DU/AC

to 2.3 DU/AC) on which, in part, the IWA based its future water demand analysis when preparing its planning documents, including its Urban Water Management Plan. The proposed Project will increase water demand by 0.18% over IWA's 2015 baseline demand (18,208 AFY), a marginal increase in local demand.

In 2015, IWA's water supplies totaled 18,208 acre-feet.[14] The City of Indio's largest water supply source is groundwater from the Whitewater River Basin. IWA works with CVWD to manage the underground water basins and to better serve the City. IWA and CVWD have access to or are working to obtain other water supply sources to meet projected water needs and help eliminate groundwater overdraft. IWA's 2040 projected water supply is 42,910 acre-feet. IWA's UWMP analyzed projected available water supply and demand through 2040 under three scenarios: average water year, single dry year, and multiply dry years. It concluded that its projected supplies will exceed projected demands under each scenario. Therefore, IWA will have sufficient water available to service the Project and reasonably foreseeable development.

To reduce water consumption, the proposed Project will be required to implement all water conservation measures imposed by the City and IWA over the life of the proposed Project. Therefore, Project impacts associated with domestic water demand are expected to be less than significant.

Domestic Water Infrastructure

The Project will connect to existing 18-inch irrigation laterals under Avenue 50 and north of the Project boundary, and the existing 8-inch water main located north of the Project site. No new wells or additional water infrastructure are proposed. Extension of water lines will have less than significant impacts on the environment as they will be limited to the Project site and immediate vicinity.

Wastewater Treatment

The Project site is served by CVWD for wastewater collection and treatment services. The Project site does not currently contain any wastewater infrastructure. The proposed Project will require construction of on-site sewer infrastructure to connect to the existing sewer mains located under Avenue 50 rights-of-way and along the southerly Project boundary. Sewage will be conveyed to the CVWD wastewater treatment plant (WRP-7) located at Avenue 38 and Madison Street.

The Project will result in 103 new single-family residences, thus generating an additional 20,600 gallons of wastewater per day (based on 200 gallons per day for a four-person residence[15]) at buildout. The WRP-7 treatment capacity is 5 million gallons per day; therefore, the Project's projected wastewater generation would account for approximately 0.4% of treatment capacity. In 2015, WRP-7 treated 3,018 acre-feet of wastewater, which is equivalent to approximately

[14] Indio Water Authority 2015 Urban Water Management Plan Final Report, July 1, 2016.
[15] Coachella Valley Water District Sewer Service Rate Study Report, prepared by Stantec, May 16, 2017.

53.9% of its capacity.[16] Therefore, WRP-7 has sufficient available capacity to serve the Project and its existing commitments.

The Project's wastewater discharges will be typical of residential uses and would not exceed wastewater treatment requirements of the CVWD or Regional Water Quality Control Board. The Project 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, other than parcel-level extensions. Impacts would be less than significant.

Drainage System

The City will require that the Project retain the 100-year storm on-site. Per the Municipal Code Section 162.140, "properties of one acre or greater in size shall be designed to retain the 100-year, 24-hour, duration storm on site".

MDS Consulting prepared a Preliminary Drainage Report that analyzed the drainage impacts of the proposed Project (see Appendix H). As discussed in Section 2.12, Hydrology and Water Quality, the site will be graded to direct drainage as surface flow into the proposed private streets where proposed curb inlet catch basins will capture and convey stormwater to six (6) onsite retention basins. A final hydrologic analysis will be required in conjunction with the preparation of grading and improvement plans to demonstrate that the Project meets the City's standards. These standard requirements will assure that impacts associated with drainage systems remain less than significant.

Electricity

As discussed in Section 2.8 (Energy Resources) of this EIR, the Project would consume approximately 897,797 kWh of electricity per year at build out. This represents 0.14% of 2010 City-wide usage, a nominal increase in local demand. The Project will require local connections to the existing IID infrastructure in the Project area. IID has existing facilities aboveground on the north side of Avenue 50 and underground on the south side. Construction of the Project will comply with applicable IID guidelines regarding installation, extensions, and connections to limit impacts to electricity infrastructure and avoid service interruptions. Other than parcel-level extensions, the Project will not require the addition or expansion of electric power facilities. Impacts will be less than significant.

Natural Gas

As discussed in Section 2.8 (Energy Resources) of this EIR, operation of the Project would consume approximately 31,522 therms of natural gas per year. This represents 2.8% of 2010 City-wide therm consumption, a minimal increase in local demand. The Project will require local connections to the existing SoCalGas infrastructure in the Project area. The closest gas lines are located underground on the south side of Avenue 50. Other than parcel-level extensions, the Project will not require the addition or expansion of natural gas facilities. Prior to ground

[16] 2015 Urban Water Management Plan Final Report, prepared for Coachella Valley Water District, July 1, 2016.

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. Impacts will be less than significant.

Telecommunications
The Project will require parcel-level connections to the existing Frontier Communications and Spectrum infrastructure in the Project area. However, the Project will not require the addition or expansion of telecommunication facilities such that adverse environmental impacts would occur. Impacts will be less than significant.

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.

General Plan Amendment
The proposed General Plan Amendment would change the land use designation on the Project site from Desert Estates Neighborhood (up to 1 du/ac) to Transitional Neighborhood (0-3 du/ac), thereby increasing the development potential on the subject property from a maximum buildout of 45 dwelling units to 136 dwelling units, for an increase of 91 dwelling units. It would also revise the General Plan land use map and text accordingly. Amendments would apply only to the subject property.

Construction Impacts
Construction of future development under the current General Plan (Desert Estates Neighborhood) or the proposed GPA (Transitional Neighborhood) would generate similar types of solid waste in the form of sediments, trash and debris, oil and grease, fuels, lubricants, asphalt and concrete waste, and other materials. Maximum buildout of the GPA would result in 91 additional dwelling units and a proportional increase in construction waste. All debris would be placed in appropriate onsite containers and disposed of in accordance with applicable standards. Non-hazardous construction materials that cannot be reused or recycled would be accepted for disposal at regional landfills. Any hazardous materials (e.g. chemicals, oils, fuels, lubricants, paints, and solvents) would be recycled, treated, and/or disposed of in accordance with federal, State, and local laws (See Section 2.11, Hazards and Hazardous Materials). Construction-related solid waste generation will be short-term, and local and/or regional landfills would have sufficient permitted capacity to accommodate construction-related solid waste disposal needs on the Project site. Impacts will be less than significant.

Operational Impacts
As discussed above, Burrtec Waste and Recycling Services (Burrtec) provides solid waste services to the City of Indio. Solid waste is recycled, reused, or transformed at a waste-to-

energy facility[17], or disposed of at one of the county's landfills. County landfills serving the City of Indio have a combined remaining capacity of 183,364,582 cubic yards, with a maximum permitted capacity of 257,033,769 cubic yards.[18]

Commingled recyclable materials (e.g., paper, plastic, glass, cardboard, aluminum) will be transported to Burrtec's material recovery facilities for recycling and reuse. Burrtec is responsible for maintaining standards that assure that all waste is handled in a manner that meets local, state and federal standards.

Buildout of the additional 91 dwelling units facilitated by the proposed GPA is projected to generate 140.54 tons of solid waste per year, as shown below. Buildout of the proposed GPA on the Project site will increase solid waste generation compared to the existing General Plan designation, and the increase is equivalent to approximately 0.003% of the County's remaining capacity.[19]

Table 2.20-1
Estimated Additional Solid Waste Disposal at the General Plan Amendment Buildout

Land Use	Per Resident Disposal Rate[1]	Additional Residents[2]	Solid Waste Disposal (pounds per day)	Solid Waste Disposal (tons per year)
Residential	5.1 pounds/day	302	1,540.2	281.09
			TOTAL (with 50% diversion)	140.54

[1] Jurisdiction Diversion/Disposal Rate Summary by CalRecycle, 2019 Indio disposal rate (pounds per day per resident), https://www2.calrecycle.ca.gov/LGCentral/DiversionProgram/Jurisdiction DiversionPost2006, accessed February 2021.
[2] See Section 2.15.6 of this DEIR.

The GPU EIR (page 4.16-27) estimated that buildout of the GPU would generate 48,680 tons of solid waste per year, not accounting for reductions from diversion. Impacts would be reduced through adherence to GPU policies, Municipal Code requirements, and diversion requirements. Impacts related to solid waste disposal and regulatory compliance would be less than significant.

Buildout of the GPA would increase solid waste generation by 281.09 tons per year (assuming no diversion), which represent a 0.58% increase from the total waste generation at buildout of the General Plan. Given the marginal increase and further waste reduction through recycling, the proposed GPA impacts associated with solid waste disposal would remain less than significant.

17 Riverside County Nondisposal Facility Element by Riverside County Department of Waste Resources (2015), https://www.rcwaste.org/Portals/0/Files/Planning/CIWMP/NDFE.PDF, accessed February 2021.
18 CalRecycle Solid Waste Information System (SWIS), https://www2.calrecycle.ca.gov/SolidWaste/Site/Search, accessed February 19, 2021.
19 Assumes that 1 CY of residential solid waste is equivalent to 95 lbs. "Volume to Weight Conversion Factors," US EPA Office of Resource Conversion and Recovery. April 2016.

VENTANA Specific Plan

Construction Impacts
Construction of the proposed Project would generate the same types of solid waste described above in association with GPA buildout. Wastes are likely to include sediments, trash and debris, oil and grease, fuels, lubricants, asphalt and concrete waste, and other materials. All debris would be disposed of in accordance with applicable standards. Non-hazardous materials that cannot be reused or recycled would be accepted for disposal at regional landfills. Hazardous materials would be recycled, treated, and/or disposed of in accordance with federal, State, and local laws (See Section 2.11, Hazards and Hazardous Materials). Waste generation will be short-term, and local and/or regional landfills would have sufficient permitted capacity to accommodate the Project's disposal needs. Impacts will be less than significant.

Operational Impacts
The Project will generate 158.69 tons of solid waste per year as shown below.

Table 2.20-2
Estimated Solid Waste Disposal at the Project Buildout

Land Use	Per Resident Disposal Rate[1]	Project Residents[2]	Solid Waste Disposal (pounds per day)	Solid Waste Disposal (tons per year)
Residential	5.1 pounds/household /day	341	1,739.1	317.39
			TOTAL (with 50% diversion)	158.69

[1] Jurisdiction Diversion/Disposal Rate Summary by CalRecycle, 2019 Indio disposal rate (pounds per day per resident), https://www2.calrecycle.ca.gov/LGCentral/DiversionProgram/Jurisdiction DiversionPost2006, accessed February 2021.
[2] See Section 2.15.6 of this DEIR.

At buildout, the proposed Project will contribute less than 0.004% of the County's remaining capacity.[20] Commingled recyclable materials (e.g., paper, plastic, glass, cardboard, aluminum) will be transported to Burrtec's material recovery facilities for recycling and reuse. Burrtec is responsible for maintaining standards that assure that all waste is handled in a manner that meets local, state and federal standards. Adherence to these requirements and General Plan policies will assure that impacts associated with solid waste disposal are less than significant.

2.20.7 Mitigation Measures

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

2.20.8 Significance After Mitigation

Impacts associated with utilities and service systems would be less than significant.

[20] Assumes that 1 CY of residential solid waste is equivalent to 95 lbs. "Volume to Weight Conversion Factors," US EPA Office of Resource Conversion and Recovery. April 2016.

2.20.9 Cumulative Impacts

The study area for the GPU EIR (page 5-19) assessment of cumulative impacts to utilities was the applicable provider's service area. The EIR determined that future development facilitated by the GPU could have cumulative impacts associated with additional demands for public utilities, resulting in the need for new or expanded facilities or infrastructure. However, adverse effects would be reduced through implementation of federal, state, and regional programs, compliance with Municipal Code and General Plan policies, and review by the City and other relevant agencies. Impacts would be reduced such that the General Plan's contribution to cumulative utility impacts would not be cumulatively considerable. Compared to the General Plan, maximum buildout of the additional 91 units resulting from the proposed GPA would result in a 0.2% increase in the number of dwelling units and buildout of the 103 units of the proposed Project would result in a 0.3% increase, but both would develop the same parcels and land area as the current General Plan designation. As discussed below, the Project would result in only a marginal increase in development that would not contribute considerably to cumulative impacts on utilities and service systems in the Coachella Valley.

IWA provides water services and CVWD provides wastewater treatment in the Project vicinity. The proposed Project will result in an increase of less than 0.08 percent of IWA total water supply in year 2040 under the worst-case assumption (multiple-dry year (3rd year)). IWA has adequate supplies to meet demands during normal, single-dry, and multiple-dry years throughout the 20-year planning period based on growth projections under the currently adopted general plan. Construction and operation of the proposed Project would not require the construction or expansion of stormwater or wastewater facilities because their impacts on these facilities will be minimal and sufficient capacity exists. When considered in conjunction with other projects in the City's General Plan boundaries, the proposed Project will have a marginal and fractional impact on services. Therefore, the Project's contribution to cumulative impacts related to these services would not be cumulatively considerable.

IID and SoCal Gas have policies, programs, and projects in place to provide continued, adequate energy to their users, including the proposed Project. As discussed above, the Project would marginally increase the City's overall electricity and natural gas demand, and would not require additional facilities other than local connections to existing facilities in the Project vicinity. Therefore, the proposed Project's incremental demand for electricity and natural gas facilities would not be cumulatively considerable.

Regarding solid waste, implementation of State and municipal requirements to reuse and recycle construction and operation waste would lessen the amount of solid waste generated by the Project. When considered in conjunction with other development projects in the region, the solid waste generated by the proposed Project will represent a fractional increase in waste to landfills. Cumulative impacts would be less than significant.

CITY OF INDIO
VENTANA SPECIFIC PLAN

DRAFT
ENVIRONMENTAL IMPACT REPORT

3. ALTERNATIVE PROJECTS ANALYSIS

3.1. Introduction

While Section 2 provides a detailed analysis of a full range of potential impacts associated with the proposed VENTANA Specific Plan Project (Project), this section of the EIR addresses the potential impacts associated with the development of alternatives to the proposed Project.

As required by CEQA Guidelines (Section 15126.6), Section 3 sets forth the key objectives that this Project seeks to fulfill. CEQA requires the analysis of “a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project” (Guidelines, Section 15126.6(c)). This section also states that the EIR "must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation.”

An EIR is not required to consider alternatives which are infeasible. Therefore, this section of the EIR describes and analyzes the potential impacts of two potentially feasible alternatives: Alternative 1: No Project/Existing General Plan; and Alternative 2: Suburban Neighborhood.

To provide a basis for comparison with each of the areas of environmental impact that were analyzed in Section 2, the same resource topics are considered in this section for each alternative.

This EIR analyzes the following resource topics:

- Aesthetics
- Agricultural and Forestry Resources
- Air Quality
- Biological Resources
- Cultural Resources
- Energy
- Geology and Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Resources
- Land Use and Planning
- Noise
- Population, Housing and Socio-Economic Resources
- Public Services
- Recreational Resources
- Transportation and Traffic
- Tribal Cultural Resources
- Utilities and Service Systems

Where mitigation is required for an alternative and the same mitigation measures required for the proposed Project in Section 2 apply, a reference to the appropriate Section 2 mitigation measures is made. Where additional mitigation measures are required for an alternative, the alternative-specific mitigation measures are listed in this section.

3.1.1. Statement of Project Goals and Objectives

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

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

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

- Provide a bridge and buffer between the rural atmosphere of the Desert Estates and more urban Suburban Neighborhoods
- Provide a range of residential densities that allow a broad range of housing for all segments of Indio's population
- Provide diverse products of modern, energy efficient single-family homes in a planned community

- Provide neighborhood parks, community swimming pools, passive parks and/or dog parks within the neighborhood, without having to access collector or larger roadways
- Expand housing inventory for City residents

Discussion of Project Objectives and Alternatives

The purpose of the objectives is to assist the City in developing a reasonable range of project alternatives to evaluate in this EIR. These objectives are intended to explain the purpose of the Project, and to aid the decision-makers in determining the relative benefits and drawbacks associated with each alternative.

Table 3.1-1 below summarizes whether the proposed Project or the Project Alternatives meet project objectives.

Table 3.1-1
Comparison of Alternatives to Project Objectives

Proposed Objectives	Proposed Project	Alternative 1	Alternative 2
Provide a bridge and buffer between the rural atmosphere of the Desert Estates and more urban Suburban Neighborhoods.	Yes	No	No
Provide a range of residential densities that allow a broad range of housing for all segments of Indio's population.	Yes	No	No
Provide diverse products of modern, energy efficient single-family homes in a planned community.	Yes	No	Yes
Provide neighborhood parks, passive parks and/or dog parks within the neighborhood, consistent with the General Plan's vision for a more connected community.	Yes	No	Yes
Expand housing inventory for City residents.	Yes	Yes	Yes

As shown in Table 3.1-1, Alternative 1 meets the least number of Project objectives, because it would result in a single, large lot product type with limited, if any, community open space, and would not accommodate a broad range of residents' housing needs. Alternative 2 would meet some of the Project objectives, but would not result in a mid-density bridge between the more intense Suburban Neighborhood and urban development to the west, and the less intense Desert Estates and more rural development to the east. On the basis of the Project objectives, the Proposed Project is the preferred alternative, followed by Alternative 2, and Alternative 1 is the least desirable alternative.

3.1.2. Summary of Alternatives

Two alternatives were selected for analysis, based on the potential of each alternative to reduce the significant and unavoidable impacts of the proposed Project, and the ability to meet the stated project objectives. Each alternative is summarized below. Alternatives considered but not analyzed further are also discussed.

3.1.3. Alternative 1 – "No Project/Existing General Plan" Alternative

As required by CEQA Guidelines Section 15126.6(e), the No Project/Existing General Plan Alternative describes buildout of the Project area consistent with the existing General Plan land use designation. Alternative 1 assumes the site will be built out at 1 DU/AC, the maximum density allowed by the current "Desert Estates Neighborhood" designation in the City's 2040 General Plan, and would result in 45 single family dwelling units.

3.1.4. Alternative 2 – "Suburban Neighborhood" Alternative

Alternative 2 would include a General Plan Amendment which changes the designation of the site to Suburban Neighborhood, a land use designation which currently exists in the General Plan. The Suburban Neighborhood designation allows 0-8 units per acre, and is the next density range currently available in the City's General Plan. Under this alternative, up to 361 residential units could be constructed. For purposes of this analysis, and based on the need for common area open space, parking and retention areas, it has been assumed that the units would be attached condominiums, townhomes or apartments. This alternative would still be accessed from Avenue 50.

3.1.5. Other Alternatives Considered But Not Further Analyzed

Pursuant to CEQA Guidelines 15262.6(c), an EIR should also identify any alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process and briefly explain the reasons underlying the lead agency's determination. The following project alternatives were considered by the City, but were not further analyzed because it was determined they would not meet one or more of the project objectives.

<u>Alternative Density Scenario</u>
An alternative which would allow 0-2 units per acre, or a total of 91 units, consistent with the density of the existing Desert River Estates project, was considered. It was rejected because it would not meet most of the project objectives, and would not be allowed under current General Plan land use designations.

Alternative Site Scenario

The Alternative Site scenario was also considered, but no alternative site was available for sale, or met the project objectives in this area of the City.

3.2. Alternative Projects Analysis Summary

As noted, this section analyses the environmental categories and thresholds set forth in Appendix G of the CEQA Guidelines. First, the existing conditions are briefly summarized and reference made to the corresponding Section 2 discussion where more detail is a provided. Then, each impact threshold is cited and the effects of each of the two alternatives briefly analyzed. Impact mitigation is then briefly discussed, if necessary, as is an assessment of the environmentally superior alternative.

3.3. Aesthetics

3.3.1. Introduction

This section considers the potential aesthetic impacts associated with the implementation of the two alternatives to the proposed Project, and also provides a comparison of the level of impact when compared to the proposed Project.

Under Alternative 1, the site would be expected to build out with a total of 45 single family homes, and associated roadways. No site plan was prepared for this alternative, but it would be expected that all lots would face onto an internal street, that full improvements would be provided on Avenue 50, and that the alternative project would be gated.

For Alternative 2, the Suburban Neighborhood designation would allow up to 361 units on the site. At this density, it has been assumed that attached, two- and three-story condominiums or townhomes would be built, with common area open space, surface parking areas and roadways extending through the development. As with Alternative A, it would be expected that Avenue 50 would be fully improved, and that the alternative project would be gated.

3.3.2. Existing Conditions

The subject property is currently vacant and generally flat, with the exception of a man-made mound on the west central boundary of the site. The Santa Rosa Mountains are visible to the west and southwest from the property, and the San Bernardino Mountains and Indio Hills are perceptible to the north and northeast at a distance.

Current development surrounding the property consists of single family homes on half-acre lots to the west, a vacant walled 1-acre lot subdivision and existing homes on 1-acre walled lots to the north and northeast; single family homes on 5± acre lots to the east and southeast, and an existing country club, with single family homes surrounding a golf course across Avenue 50 to the south.

There are no scenic highways in the vicinity of the Project site. Please see Section 2.3 for a description of the regulatory framework and environmental setting associated with aesthetic resources.

3.3.3. Alternatives Impact Analysis

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

Alternative 1 (No Project/Existing General Plan)

Alternative 1 would result in the development of 45 single family homes on 1-acre lots. Access to these lots would be from Avenue 50, and a parkway, sidewalks, and on-street bike lanes would be expected to be constructed as part of such a subdivision. Based on surrounding subdivisions in the area, it is also assumed that the subdivision would be gated, with an entry feature and perimeter wall. Homes within the project would be built to Country Estates zone standards, and would be a minimum of 2,000 square feet, and up to 25 feet and/or two stories in height. Based on the homes built to the north and northeast of the site, homes in the 5,000+ range would be expected. Perimeter landscaping and walls would also be expected, similar to that surrounding the 1-acre lots to the north and northeast. Internal streets would be sized as local streets, similar to those for the proposed Project. Although the mass of these homes would be greater than that proposed for the Project, there would be greater setbacks between homes, and view corridors would be created through these setbacks.

Scenic vistas were studied for the proposed Project using a series of visual simulations to assess the viewsheds from various locations around the property. Under the No Project alternative, views from Avenue 50 would be similar to those under the proposed Project, and consist primarily of foreground views of the parkway and entry in the foreground. The homes within the site under this alternative would be further set back from Avenue 50, and only rooflines would be visible from the street. Views of the mid-range and peaks of the Santa Rosas to the northwest would still be visible, and likely similar to those under the proposed Project. The public view from this location would be of a developed master planned community.

Under the No Project alternative, the view from the neighboring property to the east (View 2) would be similar in the foreground, and likely consist of parkway and entry drive. Since the easterly home is significantly elevated above grade, if a home were to be located immediately west of the property, it would likely fill only the lower field of view, and include both rear yard landscaping and the roofline of a home, up to 25 feet in height. At this location, and depending on whether parkway, open space and entry drives, rather than the rear of a home, were located immediately to the west, views of the Santa Rosas to the west and southwest would be similarly blocked by development and landscaping, but views of the peaks would remain. It is important to note that the palm trees in the foreground occur on the property to the east, not on the subject property.

At the northeast corner of the site (View 3), views from existing adjacent single family homes would be of the rear yards of larger lots and larger homes. There would likely be view corridors between homes, and fewer rooflines would be visible in the mid-ground of the view. If a home were located immediately south of the existing homes, with a rear yard, the foreground views would be partially blocked by the mass of that home, but views of the Santa Rosas would be visible on either side, and the peaks would be visible over the roofline. Scenic vistas from this location would be similar or somewhat broader than the views resulting from the proposed Project.

From the dirt road to the east of the site (View 4), homes would likely be located further back, and structures would therefore be less visible in the foreground to the northwest. Should a home be located immediately west of this location, the direct westerly view would be blocked, but views of the Santa Rosas would be visible on either side. Fewer homes would be visible in the lower half view, and the peaks of the mountains would remain visible.

Overall, under the No Project alternative, public viewsheds would be similar to those under the proposed Project, and private views from surrounding properties would be somewhat less intense, but would still reflect the built environment, with homes, yards and streets in the foreground, and the mid-range and peaks of the Santa Rosa Mountains in the background. Impacts to scenic vistas would be somewhat less than for the proposed Project, but would remain less than significant.

Alternative 2 (Suburban Neighborhood)

Under Alternative 2, up to 361 dwelling units would be constructed on the site. Because of the intensity of development, buildings would be expected to contain multiple units, and to be at least two- and possible three-stories in height. Although unit parking could be provided, it would be likely that parking areas would be needed. Common area open space would be provided as required in the City's zoning ordinance, and buildings would likely be clustered to accommodate it.

Under this alternative, public views from Avenue 50 would include parkway landscaping, street improvements and entry facilities would still occupy the foreground (View 1), but structures of two-stories in height would be clearly visible, and would obstruct much of the view of the Santa Rosa Mountains to the northwest. The mass of the structures would be greater than either the proposed Project or Alternative 1, and represent a much more urban landscape. Impacts to public views would be greater under this alternative.

From the neighboring property to the east (View 2), views of the foreground could remain parkway and entry areas, but could also include clusters of two-story homes, parking areas and common area open space. If residential units were located immediately west of this property, views of the Santa Rosas would be eliminated westerly, although view corridors could occur through clusters or rows of buildings. Depending on the proximity of buildings to the viewer, and the separation between buildings, views of the Santa Rosa Mountains to the west could be substantially blocked at this location, despite the elevated position of the viewer, and impacts would be greater than either the proposed Project or Alternative 1.

Impacts to viewers at View 3 and 4 would be similar, and would likely result in building mass in close proximity to both property lines. Massing of rows or clusters of buildings would be greater, and building heights would likely be 20 feet or more 150 feet or more from the property line. Although open space areas could occur in parts of the views, and view corridors could be created

between and through building clusters, it would be expected that the mid-range of the mountains would be blocked, and only the highest peaks visible above buildings.
Overall, the impacts to scenic vistas, both public and private, would be substantial under this alternative, and could be significant and unavoidable.

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

Alternative 1 (No Project/Existing General Plan)
Under Alternative 1, development of the site would occur at current General Plan land use designation densities of 1 DU/AC. This would represent a lowering of intensity when compared to properties to the west, and consistent densities to properties to the north and northeast. Properties to the east and southeast, which include single family homes on 5 acre lots, are much less intensively developed, but could be redeveloped to allow 1-acre lots. Development of Alternative 1 would be expected to be consistent with the Country Estates zoning standards, and would include larger one- and two-story homes, with building heights extending to 25 feet. Based on the existing Desert Estates designation, no change to the City's zoning standards would be necessary. The development of Alternative 1 would be consistent with the existing character of the area, and consistent with the Southern Neighborhood Strategies. No impact relating to visual character would be expected.

Alternative 2 (Suburban Neighborhood)
Under Alternative 2, a General Plan Amendment and Zone Change would be required to implement the alternative's density of 8 units per acre. The Suburban Neighborhood designation exists in the General Plan, and would require a Zone Change to Residential Medium (RM) to allow 8 units per acre. The development standards associated with the RM zone would apply to this alternative, which limits building height to 25 feet, and to 18 feet within 150 feet of residential land uses. The development density, as previously described, would result in attached units, which are not consistent with the character of the area immediately adjacent to the site. Suburban Neighborhood lands do occur, however, approximately 1,300 feet east of the site, and east of Jefferson Street. This property, however, is immediately adjacent to the existing neighborhood shopping center at Jefferson Street and Avenue 50, a more urban environment than the Project site. Although with the adoption of a General Plan Amendment and Zone Change, Alternative 2 would be consistent with applicable zoning, its intensity would result in greater, and substantial impacts to the visual character of the area.

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

Alternative 1 (No Project/Existing General Plan)

Alternative 1 would result in the development of 45 single family homes. These homes would include landscape lighting, security lighting and architectural lighting consistent with that provided throughout the City. As required by City standards, all lighting would be shielded and oriented downward so as not to impact surrounding properties. In addition, lights from traveling vehicles would occur on the property. None of these lighting levels would be significant, and none would result in substantial lighting or glare impacts. When compared to the proposed Project, this alternative would result in reduced lighting levels, and impacts would remain less than significant.

Alternative 2 (Suburban Neighborhood)

Under Alternative 2, the residential units would require landscape and architectural lighting, security lighting, and result in vehicle lights traveling through the site. As with all other development in the City, lighting would be required to be shielded, oriented downward, and prohibited from light spillage onto adjacent properties. Because of the scale of development under Alternative 2, lighting would be increased because of the number of units, and need for increased number of fixtures, when compared to the proposed Project and the No Project alternative, although the City's standards and requirements would limit the potential impacts. Impacts associated with light and glare would be expected to be greater under this alternative, but would remain less than significant.

3.3.4. Mitigation Measures

Impacts under either alternative would be less than significant, and no mitigation measures would be required.

3.3.5. Environmental Superior Alternative

All Alternatives, including the proposed Project, would result in development of the property, and would therefore physically change the Project site. Under the No Project Alternative and the proposed Project, development would consist of primarily single-story single family homes, and impacts to surrounding views would be similar. Although the foothills of surrounding mountains would continue to be blocked, the mid-range and peaks of the Santa Rosas would remain visible. In the case of the No Project alternative, the impact would be the lesser of the three. Impacts to both scenic vistas and visual character would be greatest under the Suburban Neighborhood alternative, as the mass and height of structures would be maximized to achieve density, and in some cases, only the peaks of mountains would likely remain visible at some locations. Similarly, for light and glare impacts, both Alternatives and the proposed Project would increase lighting levels on the site. The No Project Alternative, however, would generate the lowest lighting levels. Therefore, although aesthetic impacts under both Alternatives and the proposed Project would be less than significant, the No Project Alternative would be the least impactful, and environmentally superior alternative.

3.4. Agricultural and Forestry Resources

3.4.1. Introduction

This section addresses the potential environmental impacts of the proposed Project Alternatives related to agriculture and forest resources. As noted in Section 2.4, there will be no impacts associated with forestry, because forest lands do not occur in the City. A background of agricultural and soils classification systems and description of existing agriculture resources in the Project area are described in Section 2.4 of this EIR. The Alternatives impact analysis focuses on potential direct and indirect conversion of agriculture resources as well as potential conflicts with existing zoning for agricultural and forestry uses.

3.4.2. Existing Conditions

The site is currently zoned for residential development and designated as "Desert Estates Neighborhood" on the General Plan land use map, which allows for agricultural and residential uses. The site is located in a developed area of the City surrounded by residential uses and major roadways. The site is currently vacant and contains mixed debris and remnants of previous agricultural activities that ended in 2016. The subject site is designated as Prime Farmland on the 2016 Riverside County Important Farmland map and Figure 4.2-1 of the General Plan.

There are no Williamson Act contracts on the property.

The City does not contain any land suitable for timber production and does not contain lands zoned for timberland production pursuant to the California Timberland Productivity Act of 1982.

Please see Section 2.4 for a detailed description of the regulatory framework and existing agricultural conditions relating to the planning area.

3.4.3. Alternatives Impact Analysis

a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

b) Conflict with existing zoning for agricultural use, or a Williamson Act contract.

Alternative 1 (No Project/Existing General Plan)

Alternative 1 assumes the site would build out under the existing General Plan land use designation, "Desert Estates Neighborhood" (1 DU/AC), and would have a maximum buildout potential of 45 single family dwelling units. Alternative 1 would cover the same land (planning area) as the proposed GPA and Specific Plan, but result in fewer residential units. Although fewer

homes would result, the entire land area would be disturbed to allow for lots, roads, retention areas and potentially common area amenities. As with the proposed Project, development of the site with non-agricultural uses would convert 45.17 acres of important farmland, which only accounts for approximately 0.2% of the total important farmland area (21,267 acres) in the City. Under this alternative, there would be no conflict with existing zoning for agricultural uses, as the Desert Estates designation allows agriculture.

Alternative 1 is the "existing conditions" alternative and therefore Impacts resulting from buildout have been previously analyzed for the site in the GPU EIR. The City adopted a Statement of Overriding Considerations stating that significant adverse effects are acceptable because expected benefits outweigh unavoidable adverse environmental impacts. Therefore, impacts for Alternative 1 have already been addressed and impacts will be less than significant.

Alternative 2 (Suburban Neighborhood)

Similar to the proposed Project, Alternative 2 would include a General Plan Amendment which changes the designation of the site to "Suburban Neighborhood" (0-8 DU/AC), an existing land use in the General Plan and the next density level up from "Desert Estates Neighborhood." Maximum buildout potential under Alternative 2 would result in 361 residential units, which is a 316-unit increase over the current designation. Alternative 2 would result in the same ground level disturbance as the proposed Project but result in more residential units.

As with the proposed Project and Alternative 1, Alternative 2 will result in conversion of the vacant site to non-agricultural uses. The subject site is primarily surrounded by urban development, and with its limited size (45.17 acres) only accounts for approximately 0.2% of the total important farmland area (21,267 acres) in the City of Indio. This alternative would require a Change of Zone, in addition to a General Plan Amendment, both of which would remove agricultural activities from the property.

Impacts resulting from Alternative 2 are consistent with what was previously analyzed for the site in the GPU EIR, and the alternative will not increase the severity or introduce new impacts to agricultural resources, nor will it result in changes to General Plan policies or conflict with existing agricultural production. The City adopted a Statement of Overriding Considerations stating that significant adverse effects are acceptable because expected benefits outweigh unavoidable adverse environmental impacts. Therefore, the Alternative 2 will have less than significant impacts on the conversion of farmland.

3.4.4. Mitigation Measures

Mitigation measures are not required.

3.4.5. Environmental Superior Alternative

All Alternatives, including the proposed Project, encompass the same planning area and propose to develop the same acreage. The difference in buildout intensities between the proposed Project and Alternative 2 is irrelevant to agricultural resources and both have essentially the same level of impact. Alternative 1 would maintain the existing land use designation, Desert Estates Neighborhood, and therefore the site could potentially develop with agriculture uses. If the site develops with agricultural uses, Alternative 1 would be considered the environmentally superior alternative. If the site develops with non-agricultural uses, then Alternative 1 would have the same level of impact as the proposed Project and Alternative 2, and there would be no environmentally superior alternative.

3.5. Air Quality

3.5.1. Introduction

The following section analyzes the potential air quality impacts associated with the proposed Project alternatives. A variety of local and regional data and information, ranging from research and analysis conducted for the planning area, to regional-scale planning and environmental documents, have been used in researching and analyzing the Project alternatives and their potential effects on air quality. The CalEEMod air quality reports for the proposed Project and alternatives is provided in Appendix B of this EIR.

3.5.2. Existing Conditions

The Specific Plan area and the City of Indio are located within the Salton Sea Air Basin (SSAB) and under the jurisdiction of the South Coast Air Quality Management District (SCAQMD). Air quality in the Salton Sea Air Basin has been impacted by emissions associated with increased development, population growth, and vehicle emissions. Although air pollution is emitted locally from various sources, some of the degradation of air quality within the Salton Sea Air Basin can be attributed to sources located outside of the basin. In the Specific Plan area, SCAQMD regulates air quality and implements applicable state and federal policies and regulations.

Please see Section 2.5 for a detailed description of the regulatory framework and existing air quality conditions relating to the planning area.

3.5.3. Alternatives Impact Analysis

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

Alternative 1 (No Project/Existing General Plan)

Buildout of Alterative 1 will result in the direct and indirect generation and emission of air pollutants during construction and operation. The California Emissions Estimator Model (CalEEMod), version 2016.3.2, was used to estimate potential air pollutant emissions associated with this Alternative. CalEEMod output tables are provided in Appendix B of this EIR.

Construction-Related Emissions

Alternative 1 assumes the site would build out under the existing General Plan land use designation, “Desert Estates Neighborhood” (1 du/ac) and would have a maximum buildout potential of 45 single family dwelling units. Alternative 1 would result in the same ground level disturbance (grading for pads, streets and other project facilities) as the proposed Project but result in fewer residential units.

Construction activities will result in short-term criteria pollutant emissions associated with operation of construction equipment, employee commute, material hauling, and other ground disturbing activities. As discussed in Section 2.5.6, criteria pollutant emissions were calculated in CalEEMod using the following assumptions:

Existing LU Assumptions

- 45.17 acres site
- Max 45 single family residential units
- 1.5-year construction schedule starting mid-2021
- Preliminary grading plans estimate a net material export of 74,383 CY
- Assumed same daily trip rate for single-family residential land uses cited in the Project-specific Traffic Report (Kunzman Associates 2021)
- Applicant approved default construction equipment list (CalEEMod) for site preparation, grading, building construction, paving, and architectural coating.

The following table describes construction-related pollutant emissions for buildout of the site under Alternative 1.

Table 3.5-1
Construction Criteria Pollutant Emissions – Alternative 1
(lbs./day)

Max. Daily Emissions	CO	NO_x	ROG	SO_x	PM_{10}	$PM_{2.5}$
Existing Conditions (Alt. 1)	36.5	73.0	8.0	0.2	9.5	6.0
SCAQMD Threshold	**550.00**	**100.00**	**75.00**	**150.00**	**150.00**	**55.00**
Exceeds Threshold	**No**	**No**	**No**	**No**	**No**	**No**

Source: CalEEMod Version 2016.3.2. See Appendix B for detailed tables. Value shown represents the average unmitigated emissions of summer and winter outputs. Emissions rounded up to the nearest half number.

* Source: "SCAQMD Air Quality Significance Thresholds" prepared by SCAQMD.

Note: PM_{10} and $PM_{2.5}$ emissions are shown as "mitigated" in the CalEEMod output tables; however, the mitigation used is standard dust control requirements imposed by the City.

As shown in the table above, SCAQMD daily thresholds for CO, NO_x, ROG, SOx, PM_{10} and $PM_{2.5}$ will not be exceeded during construction of Alternative 1. Impacts will be less than significant, and marginally lower than the proposed Project.

Operation

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

The following table identifies the unmitigated, maximum daily pollutant emissions for operation of Alternative 1.

Table 3.5-2
Operational Criteria Pollutant Emissions – Alternative 1
(lbs./day)

	CO	NO_x	ROG	SO_x	PM_{10}	$PM_{2.5}$
Existing Conditions (Alt. 1)						
Max. Daily Emissions	13.0	7.0	3.5	0.1	2.0	1.0
SCAQMD Threshold	550.00	100.00	75.00	150.00	150.00	55.00
Exceeds Threshold	**No**	**No**	**No**	**No**	**No**	**No**

Source: CalEEMod Version 2016.3.2. See Appendix B for detailed tables. Value shown represents the average emissions of summer and winter outputs. Emissions rounded up to the nearest half number.

As shown in the table above, project-level SCAQMD daily thresholds for CO, NO_x, ROG, SOx, PM_{10} and $PM_{2.5}$ will not be exceeded under Alternative 1. Impacts will be less than significant, and marginally lower than the proposed Project.

Cumulative Contribution: Non-Attainment Criteria Pollutants

As discussed in Section 2.5.6, a significant impact could occur if the project would make a considerable cumulative contribution to federal or State non-attainment pollutants. The Coachella Valley portion of the SSAB is classified as a "non-attainment" area for PM_{10} and ozone. Cumulative air quality analysis is evaluated on a regional scale (rather than a neighborhood scale or city scale, for example) given the dispersing nature of pollutant emissions and aggregate impacts from surrounding jurisdictions and air management districts. Any development project or activity resulting in emissions of PM_{10}, ozone, or ozone precursors will contribute, to some degree, to regional non-attainment designations of ozone and PM_{10}.

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

As shown in the tables above, Alternative 1-related PM_{10} and ozone precursors (NOx and ROG) emissions are projected to be well below established SCAQMD thresholds. Emissions will be further reduced through adherence to standard City and SCAQMD rules and regulations pertaining to PM_{10} reduction, including implementation of a Dust Control Plan in accordance with SCAQMD Rule 403.1. Therefore, Alternative 1 will result in incremental, but not cumulatively considerable impact on regional PM_{10} or ozone levels.

Alternative 2 (Suburban Neighborhood)

General Plan Amendment

Alternative 2 would include a General Plan Amendment which changes the designation of the site to "Suburban Neighborhood" (0-8 DU/AC), an existing land use in the General Plan and the next density level up from "Desert Estates Neighborhood." Maximum buildout potential under Alternative would result in 361 residential units, which is a 316-unit increase when compared to the current land use designation. Alternative 2 would result in the same ground level disturbance as the proposed Project but result in more residential units.

The GPU EIR determined that future development facilitated by the General Plan would result in a considerable net increase in ozone, CO, PM10 and PM2.5, resulting in a significant impact to regional attainment of the NAAQS and CAAQS for the Coachella Valley. Compared to the General Plan, and similar to the proposed Project and Alternative 1, the maximum buildout of the Alternative 2 GPA would result in increased levels of criteria pollutants and would therefore contribute to the cumulatively considerable impacts previously identified in the GPU EIR. However, adverse effects would be reduced through adherence to federal, state, and regional regulations, compliance with SCAQMD thresholds and General Plan policies, and project-level CEQA review by the City and other relevant agencies. The City determined that the social and economic benefits of developing the planning area outweighed the severity of these impacts, and a Statement of Overriding Considerations was adopted. Implementation of the Alternative 2 GPA would not result in any new adverse impacts or significantly increase the severity of previously identified significant impacts in the Certified EIR. Therefore, the Alternative 2 GPA would result in only a marginal increase in criteria pollutants (see Buildout Scenario discussion below) but would not contribute considerably to cumulative impacts on air quality in the Salton Sea Air Basin or Coachella Valley.

Alternative 2 Buildout Scenario

Buildout of Alterative 2 will result in the direct and indirect generation and emission of air pollutants during construction and operation. The California Emissions Estimator Model (CalEEMod), version 2016.3.2, was used to estimate potential air pollutant emissions associated with this Alternative. CalEEMod output tables are provided in Appendix B of this EIR.

Construction-Related Emissions

Maximum buildout potential under Alternative 2 would result in 361 residential units. Alternative 2 would cover the same land (planning area) as the proposed Project but result in more residential units.

Construction activities associated with buildout of Alternative 2 will result in short-term criteria pollutant emissions associated with operation of construction equipment, employee commute, material hauling, and other ground disturbing activities. Criteria pollutant emissions were calculated in CalEEMod using the following assumptions:

Alternative 2 Assumptions:

- 45.17 acres site
- Max 361 single family residential units
- 3-year construction schedule starting mid-2021
- Preliminary grading plans estimate a net material export of 74,383 CY
- Assumed same daily trip rate for single-family residential land uses cited in the Project-specific Traffic Report (Kunzman Associates 2021)
- Applicant approved default construction equipment list (CalEEMod) for site preparation, grading, building construction, paving, and architectural coating

The following table describes construction-related pollutant emissions for buildout of the site under Alternative 2.

Table 3.5-3
Construction Criteria Pollutant Emissions – Alternative 2
(lbs./day)

Max. Daily Emissions	CO	NO_x	ROG	SO_x	PM_{10}	$PM_{2.5}$
Alternative 2	47.5	73.5	12.5	0.15	9.5	6.0
SCAQMD Threshold	**550.00**	**100.00**	**75.00**	**150.00**	**150.00**	**55.00**
Exceeds Threshold	**No**	**No**	**No**	**No**	**No**	**No**

Source: CalEEMod Version 2016.3.2. See Appendix B for detailed tables. Value shown represents the average unmitigated emissions of summer and winter outputs. Emissions rounded up to the nearest half number.

* Source: "SCAQMD Air Quality Significance Thresholds" prepared by SCAQMD.

Note: PM_{10} and $PM_{2.5}$ emissions are shown as "mitigated" in the CalEEMod output tables; however, the mitigation used is standard dust control requirements imposed by the City.

As shown in the table above, SCAQMD daily thresholds for CO, NO_x, ROG, SOx, PM_{10} and $PM_{2.5}$ will not be exceeded during construction of Alternative 2. Impacts will be less than significant, and marginally higher than the proposed Project.

Operation

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

The following table identifies the unmitigated pollutant emissions during operation of Alternative 2. Data represent maximum daily emissions.

Table 3.5-4
Operational Criteria Pollutant Emissions – Alternative 2
(lbs./day)

	CO	NO_x	ROG	SO_x	PM_{10}	$PM_{2.5}$
Alternative 2						
Max. Daily Emissions	72.5	35.5	14.5	0.2	11.0	3.5
SCAQMD Threshold	550.00	100.00	75.00	150.00	150.00	55.00
Exceeds Threshold	**No**	**No**	**No**	**No**	**No**	**No**

Source: CalEEMod Version 2016.3.2. See Appendix B for detailed tables. Value shown represents the average emissions of summer and winter outputs. Emissions rounded up to the nearest half number.

As shown in the table above, project-level SCAQMD daily thresholds for CO, NO_x, ROG, SOx, PM_{10} and $PM_{2.5}$ will not be exceeded under Alternative 2. Impacts will be less than significant, but somewhat higher than the proposed Project.

Cumulative Contribution: Non-Attainment Criteria Pollutants

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

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

As shown in the tables above, Alternative 2-related PM_{10} and ozone precursors (NOx and ROG) emissions are projected to be well below established SCAQMD thresholds. Emissions will be further reduced through adherence to standard City and SCAQMD rules and regulations pertaining to PM_{10} reduction, including implementation of a Dust Control Plan in accordance with SCAQMD Rule 403.1. Therefore, Alternative 2 will result in incremental, but not cumulatively considerable impact on regional PM_{10} or ozone levels.

c) Expose sensitive receptors to substantial pollutant concentrations?

Alternative 1 (No Project/Existing General Plan)

The purpose of analyzing Localized Significance Thresholds (LST) is to determine whether a project may generate significant adverse localized air quality impacts to the nearest exposed individual or sensitive receptor. As with the proposed project, the mass rate Localized Significance Threshold (LST) Lookup Table for Source Receptor Area (SRA) 30 (Coachella Valley) at a distance of 25 meters was used to determine LST emission thresholds. As shown in the table below, Alternative 1 construction and operation will not exceed LST thresholds and impacts will be less than significant.

Table 3.5-5
Localized Significance Thresholds Emissions – Alternative 1
(pounds per day)

	CO	**NOx**	**PM_{10}**	**$PM_{2.5}$**
Construction				
Maximum Emissions	36.5	73.0	9.5	6.0
LST Threshold	**2,292.00**	**304.00**	**14.00**	**8.00**
Exceed?	**No**	**No**	**No**	**No**
Operation[1]				
Area	4.0	0.5	0.05	0.05
SCAQMD Thresholds	**2,292.00**	**304.00**	**4.00**	**2.00**
Exceed?	**No**	**No**	**No**	**No**

Emission Source: CalEEMod model, version 2016.3.2.
LST Threshold Source: LST Mass Rate Look-up Table, SCAQMD.
1. Operational emissions that affect sensitive receptors are limited to on-site area emissions. Energy and mobile emissions occur off-site.

Health Impacts

As shown in the tables above, construction and operation of Alternative 1 will result in criteria emissions that are below the SCAQMD significance thresholds, and neither would violate any air quality standard or contribute substantially to an existing or projected air quality violation. It is not scientifically possible to calculate the degree to which exposure to various levels of criteria pollutant emissions will impact an individual's health. Due to these limitations discussed in Section 2.5, the extent to which Alternative 1 poses a health risk is uncertain but unavoidable. It is anticipated that the impacts associated with all criteria pollutants will be less than significant overall, and that health effects will also be less than significant.

CO Hot Spot

As discussed in Section 18, Transportation, the Traffic Impact Analysis conducted for the Project studied 8 intersections in the Project area. All study intersections operate at LOS C or better under existing (2019-2020) conditions, existing plus project (E+P), and opening year (2022) traffic conditions for the proposed Project. Although an intersection study was not conducted for buildout of the site under Alternative 1, it can be assumed that the fewer traffic trips associated

with Alternative 1 would result in lower impacts compared to the proposed Project, because only 45 units would be constructed, and trips would be reduced. Based on results of the traffic report, the proposed Project would not cause the LOS to worsen from C to D at any intersection and would not increase the V/C ratio at any intersection rated D by 2 percent or more. Similar impacts to a lesser degree are therefore assumed for Alternative 1. As such, none of the studied intersections would meet these evaluation criteria, and therefore, Alternative 1 would not result in the creation of a CO hotspot. Sensitive receptors would not be exposed to substantial pollutant concentrations as a result of Alternative 1 traffic, and impacts would be less than significant.

Alternative 2 (Suburban Neighborhood)

Alternative 2 General Plan Amendment

As previously stated, the GPU EIR determined that impacts relating to sensitive receptors would be significant and unavoidable without project specific information to determine which, if any, specific sites would result in significant or less than significant impacts. Adverse effects associated with development of the site would be reduced through adherence to federal, state, and regional regulations, compliance with SCAQMD guidelines and General Plan policies, and project-level CEQA review by the City and other relevant agencies. The City determined that the social and economic benefits of developing the planning area outweighed the severity of these impacts, and a Statement of Overriding Considerations was adopted. Implementation of the Alternative 2 GPA would not result in any new adverse impacts or significantly increase the severity of previously identified significant impacts in the Certified EIR. Therefore, impacts would be less than significant.

Alternative 2 Buildout Scenario

As with the proposed Project and Alternative 1, the mass rate Localized Significance Threshold (LST) Lookup Table for Source Receptor Area (SRA) 30 (Coachella Valley) at a distance of 25 meters was used to determine LST emission thresholds. As shown in the table below, Alternative 2 construction and operation will not exceed LST thresholds and impacts will be less than significant.

Table 3.5-6
Localized Significance Thresholds Emissions – Alternative 2
(pounds per day)

	CO	**NOx**	**PM_{10}**	**$PM_{2.5}$**
Maximum Emissions				
Construction	47.5	73.5	9.5	6.0
LST Threshold	**2,292.00**	**304.00**	**14.00**	**8.00**
Exceed?	**No**	**No**	**No**	**No**
Operation[1]				
Area	31.0	3.5	0.5	0.5
SCAQMD Thresholds	**2,292.00**	**304.00**	**4.00**	**2.00**
Exceed?	**No**	**No**	**No**	**No**

Emission Source: CalEEMod model, version 2016.3.2.
LST Threshold Source: LST Mass Rate Look-up Table, SCAQMD.
1. Operational emissions that affect sensitive receptors are limited to on-site area emissions. Energy and mobile emissions occur off-site.

Health Impacts

As shown in the tables above, construction and operation of Alternative 1 will result in criteria emissions that are below the SCAQMD significance thresholds, and neither would violate any air quality standard or contribute substantially to an existing or projected air quality violation. It is not scientifically possible to calculate the degree to which exposure to various levels of criteria pollutant emissions will impact an individual's health. Due to these limitations discussed in Section 2.5, the extent to which Alternative 1 poses a health risk is uncertain but unavoidable. It is anticipated that the impacts associated with all criteria pollutants will be less than significant overall, and that health effects will also be less than significant.

CO Hot Spot

As discussed in Section 2.18, Transportation, the Traffic Impact Analysis conducted for the Project studied 8 intersections in the Project area. All study intersections operate at LOS C or better under existing (2019-2020) conditions, existing plus project (E+P), and opening year (2022) traffic conditions for the proposed Project. As described in Section 3.18, traffic generated by Alternative 2 would not cause impacts which would reduce LOS from C to D at any intersection, with improvements, and would not increase the V/C ratio at any intersection rated D by 2 percent or more. As such, none of the studied intersections would meet these evaluation criteria for CO Hot Spot analysis, and Alternative 2 would not result in the creation of a CO hotspot. Sensitive receptors would not be exposed to substantial pollutant concentrations as the result of Alternative 2 traffic, and impacts would be less than significant.

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

Alternative 1 (No Project/Existing General Plan)

Under Alternative 1, the existing land use designation would remain, and the site would have a maximum buildout potential of 45 single-family units. Buildout of the site under Alternative 1 has the potential to result in short-term odors associated with operation of heavy equipment during grading, excavation, and other construction activities. Odors from paints, coatings, and asphalt also will be emitted during construction. Since the entire site would be disturbed under this alternative, odors associated with construction activities would be consistent with those generated by the proposed Project or Alternative 2. However, construction-related odors will be temporary and quickly dispersed below detectable levels as distance from the construction area increases. Existing General Plan policies and regulations such as SCAQMD Rule 403.1 and Rule 481 would continue to minimize odor impacts.

At buildout, residential units will generate typical odors from cooking and other household activities but will not generate objectionable odors. Therefore, impacts from objectionable odors under Alternative 1 are expected to be less than significant.

Alternative 2 (Suburban Neighborhood)

As previously stated, Alternative 2 proposes a GPA to change the site's land use designation from Desert Estates Neighborhood to Suburban Neighborhood (8 du/ac), which would result in a maximum buildout of 361 residential units, which is a 316 unit increase from existing conditions. Alternative 2 will be developed with residential uses and has the potential to result in short-term odors associated with operation of heavy equipment during grading, excavation, and other construction activities. Odors from paints, coatings, and asphalts also will be emitted during construction. As with the proposed Project and Alternative 1, the entire site would be disturbed for construction, and odor levels would be expected to be consistent under this alternative. However, construction-related odors will be temporary and quickly dispersed below detectable levels as distance from the construction area increases. Existing General Plan policies and regulations such as SCAQMD Rule 403.1 and Rule 481 would continue to minimize odor impacts.

At buildout, residential units will generate typical odors from cooking and other household activities but will not generate objectionable odors. Therefore, impacts from objectionable odors are expected to be less than significant.

3.5.4. Mitigation Measures

As described above, impacts associated with both alternatives would remain less than significant. No mitigation measures would be required.

3.5.5. Environmental Superior Alternative

At buildout, Alternative 2 would result in overall higher criteria pollutant emissions than the proposed Project or Alternative 1, thus resulting in greater, although less than significant impacts to air quality. Alternative 1 would result in the lowest emissions at buildout and is therefore the environmentally superior alternative.

In terms of cumulative, General Plan buildout impacts, both alternatives and the proposed Project will result in cumulatively considerable impacts. The GPU EIR determined that future development facilitated by the General Plan would result in a considerable net increase in ozone, CO, PM10 and PM2.5, resulting in a significant impact to regional attainment of the NAAQS and CAAQS for the Coachella Valley.

Since Alternative 1 was studied in the GPU EIR, it, and the more intense Alternative 2, would also be expected to contribute to cumulative air quality impacts. Adverse effects would be reduced through adherence to federal, state, and regional regulations, compliance with SCAQMD thresholds and GPU policies, and project-level CEQA review by the City and other relevant agencies. The City determined that the social and economic benefits of developing the planning area outweighed the severity of these impacts, and a Statement of Overriding Considerations was adopted. Implementation of either Alternative 1 or Alternative 2 would not result in any new adverse impacts or significantly increase the severity of previously identified significant impacts in the Certified EIR. Therefore, cumulative impacts associated with air emissions for either alternative are considered less than significant.

3.6. Biological Resources

3.6.1. Introduction

This section of the EIR analyzes the potential impacts of the proposed alternatives to biological resources. The Project site is located in the Coachella Valley which is at the western edge of the Colorado Desert subdivision of the Sonoran Desert. A wide range of common plant and animal species are reported in this region. The alternatives' potential impacts to these resources are discussed and compared to the proposed Project.

3.6.2. Existing Conditions

The Project site is currently vacant and contains sparse vegetation and miscellaneous piles of trash/debris. The proposed Project is within the boundaries of and subject to the provisions of the Coachella Valley Multiple Species Habitat Conservation Plan (CVMSHCP).[1] The CVMSHCP is a comprehensive regional plan that balances growth in the Coachella Valley with the requirements of federal and State endangered species laws. The Project site is not located within or adjacent to a CVMSHCP Conservation Area and does not contain hydrological feature such as a wash or basin.

The Project-specific BRA identified a total of 31 special-status elements with the potential to occur in the Project vicinity during the literature review, 13 of which were determined to be absent during the site survey and were not discussed further. Of the remaining 18 species which have some potential to occur onsite, four are fully covered and conserved through participation in the CVMSHCP: Mesquite Bosque (Mesquite Hummocks), Coachella giant sand treader cricket, western yellow bat, and Coachella Valley (Palm Springs) round-tailed ground squirrel.

The remaining 14 special status species include plants and vegetation communities, mammals, and bird species. Most special-status elements have a low to moderate probability of occurring onsite. The only species found to occur onsite during the site survey, aside from mesquite bosque, were four bird species, including *Calypte costae* (Costa's hummingbird), *Lanius ludovicianus (*loggerhead shrike), *Phalacrocorax auratus* (double-crested cormorant), and *Polioptila melanura* (black-tailed gnatcatcher)*.*

Please see Section 2.6 Biological Resources for the full discussion of regional, local, and existing site conditions.

[1] Recirculated Final Coachella Valley Multiple Species Habitat Conservation Plan; Figure 8-3.

3.6.3. Alternatives Impact Analysis

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

Alternative 1 (No Project/Existing General Plan)

Alternative 1 assumes the site would build out under the existing General Plan land use designation, "Desert Estates Neighborhood" (1 DU/AC), and would have a maximum buildout potential of 45 single family dwelling units. Alternative 1 would cover the same land (planning area) as the proposed Project, but result in fewer residential units.

Similar to the proposed Project, Alternative 1 would facilitate future urban development that could disturb or permanently remove sensitive species and/or their habitats. As described in Section 2.6, various special-status species have been reported in the Project vicinity and observed onsite. Due to the isolated nature of the site, and extensive disturbance from past agricultural and illegal trash dumping activities, the BRA determined that special-status plant species and migratory corridors are not expected to occur onsite. Several special-status bird species occur onsite and will be protected by pre-construction surveys required by the Migratory Bird Treaty Act (MBTA). Although limited habitat for burrowing owl was identified on the site, pre-construction burrowing owl surveys would also be required prior to development of this alternative. Alternative 1 would also be required to pay the CVMSHCP local development fee, as is all new development in the region.

As with the proposed Project, compliance with the provisions and requirements of the CVMSHCP, the Migratory Bird Treaty Act and burrowing owl protocols will ensure that any potential impacts to sensitive species will be mitigated. Alternative 1 would be subject to Mitigation Measures BIO-1 through BIO-3, as would the proposed Project. With mitigation, impacts associated with build out of Alternative 1 will be less than significant.

Alternative 2 (Suburban Neighborhood)

Alternative 2 would include a General Plan Amendment which changes the designation of the site to "Suburban Neighborhood" (0-8 DU/AC), an existing land use in the General Plan and the next density level up from "Desert Estates Neighborhood." Maximum buildout potential under Alternative 2 would result in 361 residential units. Alternative 2 would cover the same land (planning area) as the proposed Project, but result in more residential units.

As with the proposed Project and Alternative 1, Alternative 2 would facilitate future urban development that could disturb or permanently remove sensitive species and/or their habitats from the entire site. Development under Alternative 2 would result in a higher density than the proposed Project or Alternative 1 which would reduce the potential for greater areas of open space for common species to use as forage and nesting areas, however implementation of either alternative or the proposed Project would result in similar impacts.

As with the proposed Project, compliance with the provisions and requirements of the CVMSHCP, the Migratory Bird Treaty Act and burrowing owl protocols will ensure that any potential impacts to sensitive species will be mitigated. Alternative 2 would be subject to Mitigation Measures BIO-1 through BIO-3, as would Alternative 1 and the proposed Project. With mitigation, impacts associated with build out of Alternative 2 will be less than significant.

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

Alternative 1 (No Project/Existing General Plan)
Development of the site under the existing land use designation would not interfere with any City policies regarding the preservation of plants or animals. The site does not contain heritage trees, as defined by the Municipal Code, and Alternative 1 would have no impact on such trees.

Similar to the proposed Project, buildout of the site under Alternative 1 would be a "Covered Activity" under the CVMSHCP and future development resulting from Alternative 1 will be subject to CVMSHCP development mitigation fees prior to ground disturbance to mitigate for potential impacts and to further the implementation of the CVMSHCP. Future development under Alternative 1 would be subject to Mitigation Measure BIO-1, as would the proposed Project.

Alternative 2 (Suburban Neighborhood)
As with the proposed Project, Alternative 2 will not interfere with any City policies regarding the preservation of biological resources. The site does not contain heritage trees, and no such trees would be disturbed as a result of implementation of Alternative 2. Future development resulting from Alternative 2 will be subject to CVMSHCP development mitigation fees prior to new ground disturbance to mitigate for potential project impacts and to further the implementation of the CVMSHCP, consistent with Mitigation Measure BIO-1. Alternative 2 impacts would be less than significant, with the implementation of the same mitigation measure as the proposed Project and Alternative 1.

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

Alternative 1 (No Project/Existing General Plan)
The City of Indio is a participant in the CVMSHCP (and its associated Natural Community Conservation Plan), and future development as a result of Alternative 1 will adhere to the requirements of the CVMSHCP. No conflict with any habitat conservation plan is expected as a result of the Alternative 1.

Alternative 2 (Suburban Neighborhood)
The City of Indio is a participant in the CVMSHCP (and its associated Natural Community Conservation Plan). Regardless of land use designation, future development as a result of Alternative 2 will adhere to the requirements of the CVMSHCP. No conflict with any habitat conservation plan is expected as a result of Alternative 2.

3.6.4. Mitigation Measures

As with the proposed Project, the mitigation measures set forth in Section 2.6.7 of this EIR will be effective at reducing potential impacts of Alternatives 1 and 2 to less than significant levels.

3.6.5. Environmental Superior Alternative

All Alternatives, including the proposed Project, encompass the same planning area and propose to develop the same parcels. The difference in buildout intensities is irrelevant to biological resources. Because development under all Alternatives, including the proposed Project, will be required to comply with the same regulations and implement the same mitigation measures accordingly, all alternatives, including the proposed Project, will have essentially the same level of impact after mitigation. In terms of areas for forage and nesting of common species, Alternative 1 has the potential to have a lesser impact than either the proposed Project or Alternative 2, insofar as greater areas of open space would likely result from this alternative, and allow forage and nesting of common species. For this reason only, Alternative 1 would be the environmentally superior alternative.

3.7. Cultural Resources

3.7.1. Introduction

This section provides an evaluation of potential cultural resource impacts that would result from implementation of Project alternatives. The Project site is located on the desert floor of the Coachella Valley, which has been home to Native Americans for millennia. Scattered cultural resources have been reported throughout the valley and are most frequently associated with areas with year-round and seasonal food sources and other ethnobotanical resource areas, lithic workshops, and trails. The potential impacts to these resources as a result of Alternatives 1 and 2 are discussed below.

3.7.2. Existing Conditions

A Cultural Resources Survey report was prepared for the proposed Project by ASM Affiliates Inc. (ASM, 2020)[2], which serves as the basis for much of the following discussion. No cultural resources were identified within or in proximity to the Project site in the historical records search and field survey.

Consultation with local Native American tribes and the Native American Heritage Commission did not yield specific information on Native American cultural resources, including sacred lands, in the Project area. Two of the tribes contacted during the SB 18 and AB 52 consultation responded in writing, requesting formal government to government consultation, tribal monitoring during ground disturbing activities, and a copy of relevant documentation from the site survey, records search and cultural resources study. The results and analysis of Tribal Cultural Resources on the Project and the Alternatives can be found in Sections 2.19 and 3.19, respectively.

Please see Section 2.7.4 and Section 2.7.5 for a detailed description of existing cultural resources conditions.

3.7.3. Alternatives Impact Analysis

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

Alternative 1 (No Project/Existing General Plan)

Alternative 1 would disturb the same lands (planning area) as the proposed Project. As discussed in Section 2.7.5, no historical resources are present within the Project area. Implementation of the Alternative 1 will not cause an adverse change to any known historical resources, and no impact would occur.

[2] "Cultural Resources Study for the Avenue 50 Indio Project, Indio, Riverside County, California," prepared by ASM Affiliates, Inc., March 13, 2020.

Alternative 2 (Suburban Neighborhood)

Similar to the proposed Project, Alternative 2 would include a General Plan Amendment which would change the designation of the site to "Suburban Neighborhood" (0-8 DU/AC), an existing land use in the General Plan and the next density level up from "Desert Estates Neighborhood." Maximum buildout potential under Alternative would result in 361 residential units. Alternative 2 would cover the same land (planning area) as the proposed Project, but result in more residential units.

The Alternative 2 General Plan Amendment would not propose new or revised goals, policies, or programs pertaining to the preservation of historical resources and, in that regard, would have no impact on existing General Plan Policies. Development under this alternative would result in the same land disturbance as both Alternative 1 and the proposed Project. The ASM records search and field survey, described in Section 2.7.5, found no evidence of historic resources on the subject property. Alternative 2 will have no impact on the significance of a historical resource defined by CEQA.

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

Alternative 1 (No Project/Existing General Plan)

No archaeological resources were observed during the site-specific cultural resources field survey nor recorded during previous surveys. Highly fragmented ceramics and glass were sparsely distributed on the ground surface throughout the entire Project area; however, they appear to be modern in nature. Much of the ground surface was previously disturbed by agricultural plowing. However, it is possible that additional archaeological materials may be present that were not detected during the survey. The land area disturbed under Alternative 1 would be equivalent to the disturbance resulting from the proposed Project. Construction monitoring by a qualified archaeologist and Native American monitor is recommended for ground disturbing activities during construction (Mitigation Measure CUL-1). With the implementation of Mitigation Measure CUL-1, potential impacts associated with archaeological resources under Alternative 1 will be reduced to less than significant levels.

Alternative 2 (Suburban Neighborhood)

Alternative 2 would increase the development potential on the subject property from a maximum buildout of 45 dwelling units to 361 dwelling units, but would disturb the same lands as the proposed Project and Alternative 1. As discussed in Section 2.7.5 and above, no archaeological resources are present within the Project area. However, it is possible that additional archaeological materials may be present that were not detected during the survey. Construction monitoring by a qualified archaeologist and Native American monitor is recommended for ground disturbing activities during construction (Mitigation Measure CUL-1). With the implementation of Mitigation Measure CUL-1, potential impacts associated with archaeological resources under Alternative 2 will be reduced to less than significant levels.

3.7.4. Mitigation Measures

As with the proposed Project, the mitigation measure set forth in Section 2.7.7 of this EIR will be effective at reducing potential impacts of Alternatives 1 and 2 to less than significant levels.

3.7.5. Environmental Superior Alternative

All Alternatives, including the proposed Project, encompass the same planning area and propose to develop the same parcels. The difference in buildout intensities is irrelevant to cultural resources. Because development under all Alternatives, including the proposed Project, will be required to comply with the same regulations and implement the same mitigation measure, all alternatives will have essentially the same level of impact after mitigation. There is no environmentally superior alternative.

3.8. Energy Resources

3.8.1. Introduction

This section describes existing energy resources in the Project area, including electrical and natural gas use and infrastructure and fuel use. It also evaluates potential impacts on energy resources that could occur as a result of implementing the alternatives and analyzes the level of impact these alternatives would have on those resources.

3.8.2. Existing Conditions

Currently, the subject site is vacant and does not generate any electricity and natural gas demands. The Project area is adequately serviced by IID and SoCalGas. Given that all Project alternatives would be located on the same site as the proposed Project, the regulatory framework, environmental setting, and existing condition analysis provided in Section 2.8 also apply to all alternatives analyzed below.

3.8.3. Alternatives Impact Analysis

a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation.

Alternative 1 (No Project/Existing General Plan)

Alternative 1 would keep the existing General Plan land use designation (Desert Estates Neighborhood, up to 1 du/ac) of the Project site and result in a maximum buildout of 45 dwelling units, which is 58 units fewer than the proposed Project. As discussed in Section 2.8.6, equipment fuels such as diesel and petroleum, rather than electricity or natural gas, will be the primary energy sources used during construction. Compared to the proposed Project, Alternative 1 will generate fewer VMTs during construction due to fewer trips required for construction of fewer units. Because it is assumed that most construction workers will live locally, it is reasonable to assume that these VMTs have already been accounted for in the community-wide VMT assumptions for worker commutes, insofar as these workers currently commute to other job sites, and do not constitute a new source of VMTs. As is the case for the proposed Project, petroleum and diesel use during construction would be temporary and minimal and would not be wasteful or inefficient with the implementation of current SCAQMD rules and regulations and State standards on fuel efficiency and equipment idling durations. Construction-related transportation energy impacts would be less than significant, and although less than significant impacts are also anticipated for the proposed Project, impacts associated with construction of Alternative 1 would be less than the proposed Project.

According to the CalEEMod outputs, the operation of Alternative 1 would consume an estimated 392,242 kWh of electricity per year for various purposes, such as ventilating/air conditioning (HVAC), refrigeration, lighting, electronics, and kitchen and laundry appliances (please see **Table**

3.8-1).[3] Alternative 1's electricity demand would represent 0.06% of 2010 City-wide kWh usage. Under Alternative 1, electricity consumption would be approximately 56% less than for the proposed Project.

According to the CalEEMod outputs, the operation of Alternative 1 would consume an estimated 13,768 therms of natural gas for heating and cooking purposes (please see **Table 3.8-1**), which is approximately 1.2% of 2010 City-wide natural gas usage. Under Alternative 1, natural gas consumption would be approximately 56% less than the proposed Project.

Alternative 1 would comply with the current California Building Code and Energy Code standards to ensure efficient consumption of electricity and natural gas. The 2019 California Green Building Code requires all residential homes built after 2020 to be zero-net-energy. These requirements assure that future buildings on the site will not waste energy. Alternative 1 will not result in wasteful, inefficient, or unnecessary consumption of electrical energy and natural gas resources during operation and, therefore, impacts would be less than significant, and less than those associated with the proposed Project.

During operation, Alternative 1 would result in 947,362 vehicle miles traveled (VMTs) to and from the subject property[4], resulting in the consumption of petroleum-based fuels related to vehicular travel by residents and local and out-of-town visitors. It should be noted that VMTs are regional in nature, and that not all Alternative 1 VMTs will occur solely within the City's boundaries. The EPA and CARB set forth up-to-date vehicle fuel efficiency standards to reduce vehicle emissions. Increased fuel efficiency means less fuel energy consumed per mile traveled. Although Alternative 1 will increase VMTs compared to existing conditions, it will not interfere with increased fuel efficiency standards and will not result in wasteful, inefficient, or unnecessary consumption of transportation energy resources during operation. Impacts would be less than significant, and lower than both the proposed Project and Alternative 2.

Alternative 2 (Suburban Neighborhood)

Alternative 2 would apply an existing land use designation (Surburban Neighborhood, 0-8 du/ac) to the Project site, and would update the General Plan land use map accordingly. The General Plan Update (GPU) EIR stated that, although exact details of the development projects implemented in accordance with the General Plan are not known at this time, there are no conditions in the General Plan planning area that would require non-standard equipment or construction practices that would increase fuel-energy consumption above typical rates (Page 8-14). Further, many General Plan policies intend to reduce energy use through energy conservation, and sustainable building practices for new developments. Therefore, the General Plan would not result in a wasteful and inefficient use of nonrenewable resources during the construction of future development, and impacts would be less than significant.

[3] CalEEMod outputs for Alternative 1 (see Appendix B).
[4] Ibid.

Regarding long term operations, the GPU EIR concluded that by implementing the GPU goals and policies, along with CAP measures, the General Plan would promote energy and water conservation while focusing development in proximity to existing population and transit routes using mixed-use and infill development. The Project site is an infill site and close to existing population and commercial uses. Implementation of the General Plan would not result in the wasteful and inefficient use of nonrenewable resources associated with construction activities or long-term growth. The 2019 California Green Building Code requires all residential homes built after 2020 to be zero-net-energy. These requirements assure that future buildings on the site will not waste energy.

Alternative 2 would be subject to all applicable General Plan policies and regulations, and therefore, Alternative 2 would not result in the wasteful and inefficient use of nonrenewable resources associated with construction activities or long-term growth. Impacts will be consistent with those identified in the GPU EIR and be less than significant.

Alternative 2 result in a maximum buildout of 361 dwelling units, which is 258 units more than the proposed Project. As discussed in Section 2.8.6, equipment fuels such as diesel and petroleum, rather than electricity or natural gas, will be the primary energy sources used during construction. Compared to the proposed Project, Alternative 2 will generate higher VMTs during construction due to more trips required for construction of more units by local workers who already commute to other job sites. As is the case for the proposed Project and Alternative 1, petroleum and diesel use during construction would be temporary and minimal and would not be wasteful or inefficient with the implementation of current SCAQMD rules and regulations and State standards on fuel efficiency and equipment idling durations. Construction-related transportation energy impacts would be less than significant, and although less than significant impacts are also anticipated for the proposed Project, impacts associated with construction of Alternative 2 would be greater than the proposed Project or Alternative 1, due to the greater intensity of development and a higher number of workers.

According to the CalEEMod outputs, the operation of Alternative 2 would consume an estimated 2,036,780 kWh of electricity per year (see **Table 3.8-1**).[5] Alternative 2's electricity demand would represent approximately 0.3% of 2010 City-wide kWh usage. Under Alternative 2, electricity consumption would be more than twice as high than the proposed Project, and 5 times higher than Alternative 1.

According to the CalEEMod outputs, the operation of Alternative 2 would consume an estimated 81,815 therms of natural gas for heating and cooking purposes (**Table 3.8-1**), which is approximately 7% of 2010 City-wide natural gas usage. Under Alternative 2, natural gas consumption would be almost 2.6 times as high as than the proposed Project, and almost 6 times higher than Alternative 1.

[5] Ibid.

Alternative 2 would comply with the current California Building Code and Energy Code standards to ensure efficient consumption of electricity and natural gas. The 2019 California Green Building Code requires all residential homes built after 2020 to be zero-net-energy. These requirements assure that future buildings on the site will not waste energy. Alternative 2 will not result in wasteful, inefficient, or unnecessary consumption of electrical energy and natural gas resources during operation and, therefore, impacts would be less than significant, though more significant than those associated with the proposed Project or Alternative 1.

During operation, Alternative 2 would result in 4,549,849 vehicle miles traveled (VMTs) to and from the subject property[6], resulting in the consumption of petroleum-based fuels. Although Alternative 2 will increase VMTs compared to existing conditions, it will not interfere with increased fuel efficiency standards and will not result in wasteful, inefficient, or unnecessary consumption of transportation energy resources during operation. Impacts would be less than significant.

Table 3.8-1
Net Energy Consumption Estimates for the Proposed Project and Project Alternatives

	Proposed Project	Alternative 1	Alternative 2
Electricity (kWh per year)	897,797	392,242	2,036,780
Natural Gas (therms per year)	31,522	13,768	81,815
Vehicle-miles traveled (VMT per year)	2,168,407	947,362	4,549,849

Source: CalEEMod Modelling for the proposed Project and Project alternatives, February 2021 (see Appendix B).

b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

Alternative 1 (No Project/Existing General Plan)

Alternative 1 would keep the existing land use designation (Desert Estates Neighborhood, up to 1 du/ac) of the Project site it to the Project site, and result in development fully consistent with the General Plan. Alternative 1 will be subject to all applicable General Plan policies, Climate Action Plan strategies and actions, and all applicable State standards enforced by the City. The General Plan contains Goal CE-3: Energy Conservation and Policies CE-3.1 and CE-3.6 that promote energy and resource-conserving designs and techniques. The GPU EIR stated that future development under the General Plan would be required to comply with the most current Title 24 Energy Efficiency Standards (Energy Code) and Green Building Standards (CalGreen) (Page 8-14). Therefore, Alternative 1 would result in less than significant impacts related to compliance with renewable energy or energy efficiency standards, consistent with the impacts associated with the proposed Project and Alternative 2.

[6] Ibid.

Alternative 2 (Suburban Neighborhood)

Alternative 2 would apply Suburban Neighborhood to the Project site, and would update the General Plan land use map accordingly. However, Alternative 2 would not result in new or revised General Plan or Climate Action Plan policies or strategies related to renewable energy or energy efficiency. As with the current General Plan land use designation (Desert Estates Neighborhood, up to 1 du/ac), Alternative 2 will still be subject to all applicable General Plan policies, Climate Action Plan strategies and actions, and all applicable State standards enforced by the City. The General Plan contains Goal CE-3: Energy Conservation and Policies CE-3.1 and CE-3.6 that promote energy and resource-conserving designs and techniques. The GPU EIR stated that future development under the General Plan would be required to comply with the most current Title 24 Energy Efficiency Standards (Energy Code) and Green Building Standards (CalGreen) (Page 8-14). Therefore, Alternative 2 would result in less than significant impacts related to compliance with applicable energy standards, and these impacts would be expected to be consistent with both Alternative 1 and the proposed Project.

3.8.4. Mitigation Measures

No mitigation measures would be required for both Alternatives as there would be less than significant impacts on energy resources.

3.8.5. Environmental Superior Alternative

With regard to potential impacts on energy resources, Alternative 1 is superior to the other alternatives because it would result in the least consumption of energy resources for construction and operation. Among the other two alternatives, the proposed Project would be the environmentally superior alternative because it would result in less overall additional energy consumption than Alternative 2.

3.9. Geology and Soil

3.9.1. Introduction

This section of the EIR analyzes the potential impacts to the Project alternatives based on regional and local geology and soils. The impacts associated with each of the alternatives is assessed, and compared to the proposed Project where appropriate.

3.9.2. Existing Conditions

Due to its complex tectonic settings, the Coachella Valley and the Project area are highly susceptible to seismic activity and associated geologic hazards. Seismicity in this region is mainly associated with the San Andreas Fault Zone and San Jacinto Fault Zone.[7] The San Andreas Fault is the closest fault in proximity to Indio and passes through the northeast portion of the City. The nearest earthquake faults to the Project site are the San Andreas Fault - Coachella Section and Southern Section, which run approximately 5.41 miles northeast of the site.

Regional soils range from rocky outcrops within the mountains bordering the valley to coarse gravels of mountain canyons and recently laid fine- and medium-grained alluvial (stream deposited) and aeolian (wind deposited) sediments on the central valley floor. The valley consists of a diverse range of rocks and sediments, which were formed or deposited over millions of years and provide important details about the geologic history of the region.

Please see Section 2.9.4 and Section 2.9.5 for a detailed description of existing geotechnical conditions.

3.9.3. Alternatives Impact Analysis

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

ii) Strong seismic ground shaking?

Alternative 1 (No Project/Existing General Plan)

Alternative 1 would result in development under the existing General Plan. Alternative 1 would be located on the same land as the proposed Project, but would fewer people to potential hazards compared to the proposed Project or Alternative 2, because of the lower number of homes which would occur. As the site is located in the vicinity of the San Andreas Fault and other local and regional faults, there is a high probability that the site will be subject to strong ground

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

shaking in the event of a major earthquake. Homes proposed for the site will be required to be constructed in accordance with the most recent edition of the California Building Code (CBC) and Indio Municipal Code Section 151.010 to provide collapse-resistant design. In addition, homes built under Alternative 1 would be required to comply with the same mitigation measures as those applied to the Project in Section 2.9.7. Based upon the adherence of structural design to applicable seismic and other codes and the mitigation measures provided for the proposed Project, the impacts of seismically induced ground shaking on the homes built under Alternative 1 can be reduced to a less than significant level.

Alternative 2 (Suburban Neighborhood)

Maximum buildout potential under Alternative 2 would result in 361 residential units. Alternative 2 would cover the same land as the proposed Specific Plan and GPA, but result in more residential units.

Alternative 2 would require a General Plan Amendment. As stated in the GPU EIR, seismic hazard risks in the City include strong ground shaking, which may result in moderate to heavy structure and infrastructure damage. However, all future development would be required to comply with applicable state laws and local regulations pertaining to seismic hazards, and to prepare site-specific geotechnical analyses. Therefore, the GPU EIR concluded that potential seismic hazard impacts associated with development facilitated by the General Plan would be less than significant. Although the General Plan Amendment required under Alternative 2 would increase the allowable residential density on the site, development on the site would still be subject to General Plan policies and existing regulations as related to seismic hazards. Therefore, Alternative 2 GPA's impacts associated with strong seismic ground shaking would be consistent with those identified in the GPU EIR and remain less than significant.

Alternative 2 would increase the development potential on the subject property from 45 dwelling units to 361 dwelling units. Alternative 2 would subject more people to potential hazards compared to the proposed Project or Alternative 1. Homes proposed under Alternative 2 will be required to be constructed in accordance with the most recent edition of the California Building Code (CBC) and Indio Municipal Code Section 151.010 to provide collapse-resistant design, and would be required to adhere to the mitigation measures in Section 2.9.7 relating to geotechnical recommendations. With adherence to applicable seismic and other codes, and the same mitigation measures as those applied to the proposed Project, the impacts of seismically induced ground shaking on the proposed buildings and structures can be reduced to a less than significant level, consistent with the proposed Project and Alternative 1.

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

Alternative 1 (No Project/Existing General Plan)

Alternative 1 would disturb the same land as the proposed Project. Similar to the proposed Project, construction of Alternative 1 may result in the short-term loss of topsoil due to runoff and wind erosion. As is required of all projects in the City, Alternative 1 is subject to SCAQMD

Rule 403.1 that requires a fugitive dust control plan. Alternative 1 will also be required to adhere to erosion control measures imposed by the City through grading and building permit regulations, including measures to control fugitive dust and requirements to create a stable soil surface, free from blowing dust and sand during the duration of the grading work (Municipal Code Section 152.01). These requirements and measures will ensure that potential erosion is controlled during construction.

At buildout, the subject property will consist of new homes, paved roads, new landscaping and otherwise stabilized surfaces, which will resist erosion. Compliance with regulatory requirements will ensure the impacts related to soil erosion or loss of topsoil are less than significant under Alternative 1.

Alternative 2 (Suburban Neighborhood)

Alternative 2 would require a General Plan Amendment to Suburban Neighborhood. As stated in the GPU EIR, future development may result in soil erosion and/or loss of topsoil, as it would involve vegetation removal, grading, and potentially earth excavation, which would expose soils and increase the potential for soil erosion from wind or stormwater runoff. The GPU EIR identified that natural hazards related to wind erosion are present primarily in the northern and eastern portions of the Sphere of Influence, not in the area of Alternative 2. Alternative 2 would be subject to General Plan policies and existing regulations as related to erosion control. Therefore, impacts associated with soil erosion from Alternative 2 would be consistent with those identified in the GPU EIR and remain less than significant.

Similar to the proposed Project and Alternative 1, construction of Alternative 2 may result in the short-term loss of topsoil due to runoff and wind erosion. Alternative 2 is subject to the same SCAQMD Rule 403.1 and will also be required to adhere to erosion control measures imposed by the City (Municipal Code Section 152.01). These requirements and measures will ensure that potential erosion is controlled during construction. At buildout, the homes, new landscaping and roads and parking areas will resist erosion. Compliance with regulatory requirements will ensure the impacts related to soil erosion or loss of topsoil are less than significant, consistent with the proposed Project and Alternative 1.

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

Alternative 1 (No Project/Existing General Plan)

Alternative 1 would disturb the same land (subject property) as the proposed Project. Impacts associated with Alternative 1 would essentially be the same as those associated with the proposed Project. The Project is not located within an area that is susceptible to landslides, liquefaction or liquefaction related hazards including lateral spreading. Surface soils of the proposed Project consist primarily of silty sand (SM), with some sand (SM and SP), clay (CH), and clayey silt (ML), which are not considered unstable soils or geologic units. The Project

geotechnical report identified no fissures or other surficial evidence of subsidence in the project area during field survey and literature review, and concluded that subsidence is considered a regional problem requiring regional mitigation not specific to the Project vicinity.

The site soils are capable of supporting Alternative 1, provided the recommendations in the geotechnical report are followed. These recommendations include remedial grading and conventional site preparation techniques such as over-excavation and re-compaction, as summarized in Section 2.9.7. Implementation of the mitigation measures (GEO-1 through GEO-7) applied to the proposed Project will ensure that impacts associated with soils remain less than significant under Alternative 1.

Alternative 2 (Suburban Neighborhood)

While the Alternative 2 General Plan Amendment would increase the allowable density on the Project site from 1 DU/AC to 8 DU/AC, future development on the site will still be subject to General Plan policies and existing regulations as related to geologic and soil instability. Therefore, impacts associated with unstable geologic unit or soil from the Alternative 2 GPA would be consistent with those identified in the GPU EIR and remain less than significant.

Impacts associated with Alternative 2 would essentially be the same as those associated with the proposed Project. As discussed above and in Section 2.9.6, the subject site is not located within an area that is susceptible to landslides, liquefaction or liquefaction related hazards including lateral spreading. The Project geotechnical report identified no fissures or other surficial evidence of subsidence in the project area during field survey and literature review, and concluded that subsidence is considered a regional problem requiring regional mitigation not specific to the Project vicinity.

Alternative 2 proposes new homes and other improvements that will be constructed in conformance with recommendations of the Project geologist and would not result in unmitigated unstable soils. These recommendations include remedial grading and conventional site preparation techniques such as over-excavation and re-compaction, as summarized in Section 2.9.7. Implementation of the mitigation measures (GEO-1 through GEO-7) associated with the proposed Project will ensure that impacts associated with soils remain less than significant under Alternative 2.

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

Alternative 1 (No Project/Existing General Plan)

Alternative 1 would disturb the same land as the proposed Project. Impacts associated with Alternative 1 would essentially be the same as those associated with the proposed Project. As discussed in Section 2.9.6, the Project Paleontological Resource Assessment concluded that the entire Project area can have high potential for significant paleontological resources both near the

ground surface and at greater depths, consistent with the sensitivity maps from the City of Indio and County of Riverside, which both indicate high potential in the Project area.

To protect potential paleontological resources in unknown depths at the site, the Project Paleontological Resource Assessment recommendations are summarized in Mitigation Measure GEO-8 in Section 2.9.7, which will assure that paleontological resources would not be impacted. Implementation of this mitigation measure will assure impacts to paleontological resources are less than significant under Alternative 1.

Alternative 2 (Suburban Neighborhood)

While the Alternative 2 General Plan Amendment would increase the allowable residential density on the Project site from 1 DU/AC to 8 DU/AC, future development on the site will still be subject to General Plan policies and existing regulations as related to paleontological resources. Therefore, impact on paleontological resources from the GPA would be consistent with those identified in the GPU EIR and remain less than significant with mitigation required in the GPU EIR.

Alternative 2 would disturb the same land as the proposed Project. Impacts associated with Alternative 2 would essentially be the same as those associated with the proposed Project. As discussed in Section 2.9.6, the Project Paleontological Resource Assessment concluded that the entire Project area can have high potential for significant paleontological resources both near the ground surface and at greater depths, consistent with the sensitivity maps from the City of Indio and County of Riverside, which both indicate high potential in the Project area.

To protect potential paleontological resources in unknown depths at the site, the Project Paleontological Resource Assessment recommendations are summarized in Mitigation Measure GEO-8 in Section 2.9.7, which will assure that paleontological resources would not be impacted. Implementation of this mitigation measure will assure impacts to paleontological resources are less than significant under Alternative 2.

3.9.4. Mitigation Measures

As with the proposed Project, the mitigation measures set forth in Section 2.9.7 of this EIR will be effective at reducing potential impacts of both Alternatives 1 and 2 to less than significant levels.

3.9.5. Environmental Superior Alternative

With regard to potential impacts related to geotechnical conditions, all alternatives would result in the same level of impacts because they would disturb the same lands (the subject property). However, Alternative 1 (No Project/Existing General Plan) is considered superior to the other alternatives because Alternative 1 would subject fewer people to potential hazards onsite.

3.10. Greenhouse Gas Emissions

3.10.1. Introduction

The following section analyzes the potential greenhouse gas emission impacts associated with the two proposed Project alternatives. A variety of local and regional data and information, ranging from research and analysis conducted for the project site, to regional-scale planning and environmental documents, have been used in researching and analyzing the project and its potential greenhouse gas impacts. Air quality and GHG emission calculations are provided in Appendix B of this EIR.

3.10.2. Existing Conditions

The project area is in the Coachella Valley portion of the Salton Sea Air Basin (SAAB or Air Basin). Some air polluting agents are also greenhouse gases, such as carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), and fluorinated gases (hydrofluorocarbons, perfluorocarbons and sulfur hexafluoride), which are released into the atmosphere through natural processes and human activities. These gases are termed greenhouse gases (GHG) due to their shared characteristic of trapping heat.

Please see Section 2.10 for a detailed description of existing greenhouse gas emission conditions and regulatory requirements.

3.10.3. Alternatives Impact Analysis

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

Greenhouse gas emission were calculated for the two Alternatives using California Emissions Estimator Model (CalEEMod) version 2016.3.2. The model calculates criteria pollutant emissions as well as greenhouse gases in carbon dioxide equivalent (CO_2e). CalEEMod output tables are provided in Appendix B of this EIR.

Alternative 1 (No Project/Existing General Plan)

Alternative 1 assumes the site would build out under the existing General Plan land use designation, “Desert Estates Neighborhood” (1 DU/AC) and would have a maximum buildout potential of 45 single family dwelling units. Alternative 1 involves the same acreage and the same parcel of land as the proposed Specific Plan and GPA but will result in fewer residential units.

As previously discussed in Section 2.10.6, buildout of the site under the existing land use designation would generate 1,192 $MTCO_2e$ over the 1.5-year construction period, and 973 $MTCO_2e$ annually at buildout (See Table 3.10.1, below). For details on modeling assumptions please refer to Section 2.10.6.

Table 3.10-1
Alternative 1 Operational and Amortized Construction GHG Emissions (Metric Tons/Year)

Alternative 1 (No Project)	**$MTCO_2e$**
Area Emissions	1.5
Energy Emissions	300.5
Mobile Emissions	563.0
Waste Emissions	30.0
Water Emissions	38.0
Amortized Construction Emissions	40.0
Total	**973**
Per Capita	**6.53**
Proposed Project GPA Buildout	
Area Emissions	4.5
Energy Emissions	908.0
Mobile Emissions	1,670.5
Waste Emissions	90.5
Water Emissions	114.5
Amortized Construction Emissions	60.0
Total	**2,848**
Per Capita	**6.3**
Proposed Project	
Area Emissions	3.5
Energy Emissions	688.0
Mobile Emissions	1,289.0
Waste Emissions	69.0
Water Emissions	87.0
Amortized Construction Emissions	48.5
Total	**2,185**
Per Capita	**6.4**

Source: CalEEMod Version 2016.3.2. See Appendix B for detailed output tables. Numbers have been rounded up to the nearest half number.

Based on Indio's average household size of 3.31 persons and 45 potential single-family residences, buildout of the site under the existing land use designation could result in an increased population of 149 residents, resulting in a per-capita emission rate of 6.53 $MTCO_2e$ per person. Furthermore, Alternative 1 proposes a residential development that passes the SCAQMD Tier 3 test, which is a non-industrial threshold of 3,000 MTCO2e/yr.

As discussed in Section 2.10, the EIR determined that General Plan buildout would achieve a cumulative emission level of 6.5 $MTCO_2e$ per capita and 5.0 $MTCO_2e$ per service population in 2020, which exceeds both reduction targets identified in the CAP, resulting in a less than significant impact. The GHG emissions associated Alternative 1 were previously captured in the GPU EIR analysis where impacts associated with buildout of the GPU land use map were found to be less than significant. Compared to the proposed Project (both the GPA and VENTANA Specific Plan), net annual GHG emissions under Alternative 1 would be lower; however, per capita emissions would be higher. Impacts from climate change would be reduced through adherence to state, regional, and federal regulations of GHG emissions, including the General Plan policies described in Section 2.10.3. Future development of the site would be subject project-level review, and components of construction and operation, including equipment, fuels, materials, and management practices, would be subject to current SCAQMD rules and regulations related to greenhouse gases. Therefore, impacts would be less than significant.

Alternative 2 (Suburban Neighborhood)

Like the proposed Project, Alternative 2 would include a General Plan Amendment which changes the land use designation of the site, in this case to "Suburban Neighborhood" (0-8 DU/AC), an existing land use in the General Plan and the next density level up from "Desert Estates Neighborhood." Maximum buildout potential under Alternative 2 would result in 361 residential units, which is a 316-unit increase. Alternative 2 involves the same acreage and the same parcel of land as the proposed Project but would increase density at buildout.

Alternative 2 proposes to increase the 45-acre site's density from 1 DU/AC to 0-8 DU/AC, and therefore has the potential to increase the GHG emissions previously analyzed in the GPU EIR. To determine if the potential increase in GHG emissions is significant, CalEEMod was used to calculate emissions associated with maximum potential buildout of the site under the existing land use designation and the proposed GPA land use designation.

Construction activities associated with buildout of Alternative 2 will result in short-term GHG emissions associated with operation of construction equipment, employee commute, material hauling, and other ground disturbing activities. GHG emissions were calculated in CalEEMod using the following assumptions:

Alternative 2 Assumptions

- 45.17 acres site
- Max 361 single family residential units
- 3-year construction schedule starting mid-2021

- Preliminary grading plans estimate a net material export of 74,383 CY
- Assumed same daily trip rate for single-family residential land uses cited in the Project-specific Traffic Report (Kunzman Associates 2021)
- Applicant approved default construction equipment list (CalEEMod) for site preparation, grading, building construction, paving, and architectural coating.

Buildout of the site under Alternative 2 would generate 2,722 $MTCO_2e$ over the 3-year construction period. There are currently no construction related GHG emission thresholds for projects of this nature. To determine if construction emissions will result in a cumulative considerable impact, buildout GHG emissions were amortized over a 30-year period and added to annual operational emissions to be compared to applicable GHG thresholds (see Table 3.10-2, below).

At buildout, there are five emission source categories that will be contributing either directly or indirectly to operational GHG emissions, including energy/electricity usage, water usage, solid waste disposal, area emissions (pavement and architectural coating off-gassing), and mobile sources. Table 3.10-2 provides a summary of the projected short-term construction and annual operational GHG generation associated with both buildout of Alternative 2 and the proposed Project.

Table 3.10-2
Alt. 2 Operational and Amortized Construction GHG Emissions
(Metric Tons/Year)

Alternative 2	**$MTCO_2e$**
Area Emissions	12.0
Energy Emissions	1,616.0
Mobile Emissions	2,654.0
Waste Emissions	83.5
Water Emissions	304.0
Amortized Construction Emissions	91.0
Total	**4,760.5**
Per Capita	**3.9**
Proposed Project GPA Buildout	
Area Emissions	4.5
Energy Emissions	908.0
Mobile Emissions	1,670.5
Waste Emissions	90.5
Water Emissions	114.5
Amortized Construction Emissions	60.0
Total	**2,848**
Per Capita	**6.3**

Table 3.10-2
Alt. 2 Operational and Amortized Construction GHG Emissions
(Metric Tons/Year)

Alternative 2	$MTCO_2e$
Proposed Project	
Area Emissions	3.5
Energy Emissions	688.0
Mobile Emissions	1,289.0
Waste Emissions	69.0
Water Emissions	87.0
Amortized Construction Emissions	48.5
Total	**2,185**
Per Capita	**6.4**

Source: CalEEMod Version 2016.3.2. See Appendix B for detailed output tables. Numbers have been rounded up to the nearest half number.

Based on Indio's average household size of 3.31 persons and 361 potential single-family residences, buildout of Alternative 2 could result in an increased population of 1,195 residents, resulting in a per-capita emission rate of 3.9 $MTCO_2e$ per person. Alternative 2 proposes a residential development that does not pass the SCAQMD Tier 3 test of 3,000 MTCO2e/yr, but does pass the Tier 2 test.

Compared to buildout of the proposed Project and Alternative 1, Alternative 2 would increase the City's annual GHG emissions; however, Alternative 2 would result in lower per capita emissions (the basis of GHG emission reduction targets) and therefore will have a net positive impact towards the City's GHG per capita reduction goals. The reduction in per capita GHG emissions as a result of Alternative 2 is consistent with both the City's communitywide per capita target of 10.6 $MTCO_2e$ and the General Plan's 6.5 $MTCO_2e$ per capita level analyzed in the GPU EIR. As with the proposed Project, all components of construction and operation under Alternative 2 would be subject to the GPU goals and policies and current SCAQMD rules and regulations related to greenhouse gases. Based on these findings, future development under Alternative 2 is consistent with the General Plan and is considered to have less than significant GHG emission-related impacts on the environment.

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

Alternative 1 (No Project/Existing General Plan)

The land use assumptions under Alternative 1 were previously analyzed in the GPU EIR and determined to have less than significant impacts on the environment. Buildout of Alternative 1 will result in emissions that are consistent with the communitywide per capita emissions threshold set forth in the General Plan and Climate Action Plan, as established by SB 32. The City's

CAP and General Plan goals and policies support transportation and energy GHG emission reduction measures consistent with the CARB 2017 Climate Change Scoping Plan. Additionally, the General Plan would support implementation of SCAG's 2016 RTP/SCS by proposing more compact, transit-friendly land use patterns. All components of construction and operation, including equipment, fuels, materials, and management practices, would be subject to the CAP, General Plan policies, and current SCAQMD rules and regulations related to greenhouse gases. Based on these findings, Alternative 1 will not conflict with an applicable plan, policy or regulation whose purpose is reducing GHG emissions, and impacts will be less than significant.

Alternative 2 (Suburban Neighborhood)

As with the proposed Project, Alternative 2 will result in emissions that are consistent with the communitywide per capita emissions threshold set forth in the General Plan and Climate Action Plan, as established by SB 32. The City's CAP and General Plan goals and policies support transportation and energy GHG emission reduction measures consistent with the CARB 2017 Climate Change Scoping Plan. Additionally, the General Plan would support implementation of SCAG's 2016 RTP/SCS by proposing more compact, transit-friendly land use patterns. All components of construction and operation, including equipment, fuels, materials, and management practices, would be subject to current SCAQMD rules and regulations related to greenhouse gases and the required state Low Carbon Fuel Standard for construction equipment and heavy-duty vehicle efficiency standards.

As with the proposed Project and Alternative 1, Alternative 2 will not conflict with an applicable plan, policy or regulation whose purpose is reducing GHG emissions, and impacts will be less than significant.

3.10.4. Mitigation Measures

Mitigation measures are not required for either Project Alternative.

3.10.5. Environmental Superior Alternative

Although the proposed Project and Project Alternatives would result in less than significant impacts, Alternative 2 is considered the environmentally superior alternative due to the significant reduction in per capita GHG emissions that would help the City achieve the Statewide per capita reduction targets established by SB 32.

3.11. Hazards and Hazardous Material

3.11.1. Introduction

This section of the EIR analyzes the potential impacts associated with the use of hazardous materials by the proposed alternatives. The Project site is located in a region where hazardous materials transport, storage, and use is strictly regulated for large quantity users, such as industrial processing plants and commercial dry cleaners. None of the alternatives will involve large quantity users. The City of Indio implements regular consultation with the Riverside County Department of Environmental Health, the Fire Department and Regional Water Quality Control Board (RWQCB) to regulate use and transport of hazardous materials. The alternatives' potential impacts are discussed below.

3.11.2. Existing Conditions

A Phase I Initial Site Environmental Assessment (Phase I) was conducted for the Project site to identify any potentially hazardous substances onsite or in the Project vicinity that could impact or be impacted by the proposed Project.[8] The Project site is currently vacant but was previously in agricultural use between around 1953 and 2016, and therefore there is a potential that pesticides have been applied at some point in the past. The Phase I identified no documented releases of pesticides at the site, but recommended a limited Phase II investigation consisting of surface soil sampling and analytical testing to evaluate the potential presence of residual pesticides, herbicides, and fertilizers associated with previous agricultural activities. The Phase II investigation was conducted for the Project site and concluded that there is no evidence of persistent pesticides on the subject property in concentrations which could present any health or safety concern for future residents.[9]

See Section 2.11.5 for additional discussion relating to hazards and hazardous materials.

3.11.3. Alternatives Impact Analysis

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.

[8] "Results of Phase I Environmental Site Assessment Proposed Residential Development Avenue 50 East of Jefferson Street Indio, California", prepared by Sladden Engineering, October 2019.

[9] "Results of Shallow Soil Sampling Proposed Residential Development APNs 602-070-004, 602-080-001 & 602-080-002 Avenue 50 East of Jefferson Street Indio, California", prepared by Sladden Engineering, November 2019.

Alternative 1 (No Project/Existing General Plan)

Alternative 1 would keep the existing General Plan land use designation (Desert Estates Neighborhood, up to 1 du/ac) for the Project site and result in a maximum buildout of 45 dwelling units.

Similar to the proposed Project, the construction of Alternative 1 would involve the use of heavy equipment, which uses limited quantities of oil and fuels and other potentially flammable substances. During construction, equipment could require refueling and minor maintenance on site that could lead to fuel and oil spills. However, as is the case for the proposed Project, the contractor building Alternative 1 will be required to identify a staging area for storing equipment and materials and will be subject to laws and regulations regarding the handling, storage, and use of hazardous materials during construction.

Long-term operation of Alternative 1 would result in the use of limited quantities of chemicals typical of a low-density residential neighborhood, such as cleaning and degreasing solvents, fertilizers, pesticides, pool chemicals, and similar materials. These chemicals will be transported to and stored in individual homes within the Project site. They will occur in limited quantities and will not require a hazardous material handling/storage permit. Residents will be responsible for the appropriate disposal of hazardous materials used in their homes, such as paint, batteries, and oils. None of these chemicals will be used in sufficient quantities so as to pose a threat to humans or cause a foreseeable chemical release into the environment. As discussed in Section 2.11.6 of this DEIR, the Project will be required to implement Best Management Practices (BMPs) which help reduce pollutants of concern that may enter receiving retention basins and affect water quality.

Alternative 1 would not result in a significant risk of explosion or accidental release of hazardous substances, because the cleaners and household chemicals used are not explosive and will not be stored in large quantities. The use and handling of hazardous materials during construction activities and long-term operation of Alternative 1 would occur in accordance with applicable federal, state, and local laws, including California Occupational Health and Safety Administration (CalOSHA) requirements. Impacts would be less than significant, and similar to that of the propose Project.

Alternative 2 (Suburban Neighborhood)

Maximum buildout potential under Alternative 2 would result in 361 residential units. Alternative 2 would cover the same land as the proposed Project, but result in more residential units.

As discussed in Section 2.11.6, all future development under the General Plan Update would be required to comply with applicable federal and state laws and local regulations pertaining to the transport, use, disposal, and accidental release of hazardous materials, including but not limited to CERCLA, RCRA, Title 22 of the California Public Health and Safety Code, the Uniform Fire Code, and Section 70.120 of the City's Municipal Code.

Alternative 2 would not change the residential nature of the future onsite development; future development would consist of dwelling units at greater density than either Alternative 1 or the proposed Project. Alternative 2 would still be subject to all applicable General Plan policies.

Similar to the proposed Project, the construction of Alternative 2 would involve the use of heavy equipment, which uses limited quantities of oil and fuels and other potentially flammable substances. During construction, equipment could require refueling and minor maintenance on site that could lead to fuel and oil spills. However, as is the case for the proposed Project and Alternative 1, staging and storage areas will be subject to laws and regulations regarding the handling, storage, and use of hazardous materials during construction.

Long-term operation of Alternative 2 includes development of residential units and landscaped areas which would involve use of limited quantities of chemicals typical of a residential neighborhood, such as cleaning and degreasing solvents, fertilizers, pesticides, pool chemicals, and similar materials. These chemicals will be transported to and stored in individual homes within the Project site. Residents will be responsible for the appropriate disposal of hazardous materials used in their homes, such as paint, batteries, and oils. None of these chemicals will be used in sufficient quantities so as to pose a threat to humans or cause a foreseeable chemical release into the environment. As discussed in Section 2.11.6 of this DEIR, the Project will be required to implement Best Management Practices (BMPs) which help reduce pollutants of concern that may enter receiving retention basins and affect water quality.

Alternative 2 would not result in a significant risk of explosion or accidental release of hazardous substances, because the cleaners and household chemicals used are not explosive and will not be stored in large quantities. The use and handling of hazardous materials during construction activities and long-term operation of Alternative 2 would occur in accordance with applicable federal, state, and local laws, including California Occupational Health and Safety Administration (CalOSHA) requirements. Impacts would be less than significant, and similar to that of the propose Project and Alternative 1, although the number of residential units, 361, would likely result in more household cleaning products than either the proposed Project or Alternative 1.

3.11.4. Mitigation Measures

No mitigation measures would be required for either Alternative as there would be less than significant impacts regarding hazards and hazardous materials.

3.11.5. Environmental Superior Alternative

Overall, Alternative 1 would be the environmentally superior alternative because it will result in the lowest number of dwelling units, therefore requiring fewer cleaning supplies and other chemicals and would expose the fewest people to potential hazards. The proposed Project would likely require fewer chemicals than Alternative 2 and thus is considered superior to Alternative 2.

3.12. Hydrology and Water Quality

3.12.1. Introduction

This section analyzes the potential impacts of the proposed alternatives to hydrological conditions and water quality.

3.12.2. Existing Conditions

The Project site is located in the Coachella Valley, where mean annual rainfall is very low on the valley floor, ranging from 2 to 4 inches per year and averaging about 5 to 6 inches along the foothills. This region is located within the Whitewater River Hydrologic Unit (HU) and falls under the jurisdiction of the Colorado River Regional Water Quality Control Board (Region 7). The alternatives' potential impacts to these resources are discussed and, where needed, mitigation measures are set forth.

Please see Section 2.12.4 and Section 2.12.5 for a detailed description of existing conditions regarding hydrology and water quality.

3.12.3. Alternatives Impact Analysis

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

Alternative 1 (No Project/Existing General Plan)
Alternative 1 would cover the same land as the proposed Project. Alternative 1 would keep the existing General Plan land use designation (Desert Estates Neighborhood, up to 1 DU/AC) for the Project site and result in a maximum buildout of 45 dwelling units, which is 58 units fewer than the proposed Project.

Construction
Similar to the proposed Project, improper handling, storage, or disposal of fuels and materials or improper cleaning of machinery could result in accidental spills or discharges that could degrade water quality. Development of Alternative 1 would result in fewer units compared to the proposed Project. As a result, the impacts to water quality associated with this alternative would be slightly less, if not similar to those of the proposed Project, and the potential for pollution of receiving waters would be comparable.

As with the proposed Project, a Preliminary Water Quality Management Plan (WQMP) which includes construction BMPs specific to Alternative 1 would be implemented, and would be expected to effectively reduce or avoid the discharge of any pollutants of concern that could

occur as a result of implementation of this alternative. Overall, impacts would be similar to those of the proposed Project, and like the proposed Project, would be reduced to less than significant levels with the implementation of a WQMP and BMPs.

Operation

At Alternative 1 buildout, runoff from the residences, hardscape and internal roadways could contain pollutants common in urban runoff. Compared to the proposed Project, the operational impacts to water quality associated with this alternative would be marginally reduced, insofar as the project intensity would be less, and the potential for pollution of receiving waters would be marginally reduced at the site. As with the proposed Project, this alternative's hydrology plan would be designed so that a 100-year storm event is captured onsite to retention basins or similar facilities. Alternative 1 would also be subject to the Whitewater River Region Stormwater Management Plan (SWMP) which regulates activities and programs to manage urban runoff, and to assure that runoff is managed in compliance with the requirements of the National Pollutant Discharge Elimination System (NPDES) municipal separate storm sewer system permit (MS4 Permit) for the Whitewater River Region. Alternative 1 would also be subject to WQMP BMPs which would help the site meet the requirements of the MS4 permit.

This alternative is also within the jurisdiction of IWA and CVWD which are required to meet water quality requirements in the production and delivery of domestic water and sewage management, respectively. Under this alternative, the residences would connect to existing water (IWA) and sewer (CVWD) infrastructure in the Project vicinity which would assure that, over the long-term, Alternative 1 would meet RWQCB standards and protect groundwater quality.

The imposition of conditions of approval, local, and state standard requirements and the requirements of the law will assure that Alternative 1 will not violate any water quality standards or waste discharge requirements. Overall, impacts to water quality would be about the same as with the proposed Project, and would be reduced to less than significant levels with the implementation of standard requirements.

Alternative 2 (Suburban Neighborhood)

Alternative 2 would increase the development potential on the subject property from a maximum buildout of 45 dwelling units to 361 dwelling units. The Alternative 2 GPA would not propose new or revised goals, policies, or programs pertaining to water quality and would have no impact on existing General Plan goals, policies, or programs. While Alternative 2 would increase the allowable residential density on the Project site, regardless of the land use designation, future projects on the site would still be subject to General Plan policies and existing regulations as related to water quality control.

Construction

Similar to the proposed Project, the use of construction equipment and other vehicles could result in spills of oil, grease, gasoline, brake fluid, antifreeze, or other vehicle-related fluids and pollutants under this alternative. Improper handling, storage, or disposal of fuels and materials

or improper cleaning of machinery could result in accidental spills or discharges that could degrade water quality. Development of Alternative 2 would result in more units compared to the proposed Project. As a result, the impacts to water quality associated with this alternative would be greater than those of the proposed Project, and the potential for pollution of receiving waters would be slightly increased.

As with the proposed Project, a Preliminary Water Quality Management Plan (WQMP) which includes construction BMPs specific to Alternative 2 would be implemented, and would be expected to effectively reduce or avoid the discharge of any pollutants of concern that could occur as a result of implementation of this alternative. Overall, although impacts would be greater than those of the proposed Project, impacts would be reduced to less than significant levels with the implementation of a WQMP and BMPs.

Operation

Runoff from the residences, common areas, parking areas and internal roadways could contain pollutants common in urban runoff. Compared to the proposed Project, the operational impacts to water quality associated with this alternative would be somewhat increased, insofar as the project intensity would be higher, and the potential for pollution of receiving waters would be increased at the site. As with the proposed Project, the alternative's hydrology plan would be designed to accommodate flows from a 100-year storm event onsite in retention basins, underground systems or similar facilities. Alternative 2 would be subject to SWMP and NPDES permitting requirements, as would the proposed Project and all alternatives, as described above. This alternative would also be subject to WQMP requirements for BMPs which would help the site to meet the requirements of the MS4 permit.

Under this alternative, the residences will connect to existing water (IWA) and sewer (CVWD) infrastructure in the Project vicinity which will assure that, over the long-term, Alternative 2 meets RWQCB standards and protects groundwater quality.

Overall, impacts to water quality would be slightly greater than the proposed Project, and would be reduced to less than significant levels with the implementation of standard requirements.

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

Alternative 1 (No Project/Existing General Plan)

The same water demand factors used to analyze the proposed Project in Section 2.12.6 were used to analyze impacts associated with Alternative 1. This alternative would generate a new water demand of 24.03 AFY, which is 8.96 AFY less than the proposed Project's total water demand. The reduction is due to the reduction in units, and assumes that much of the yards in any Alternative 1 project would be landscaped with drought tolerant plantings and no substantial amount of sod, which would have a substantially higher water demand.

Table 3.12-1
Water Demand at Alternative 1 Buildout

Proposed Land Use	Maximum Units Allowed	Water Consumption Factor	Water Demand (gpd)	Total Water Demand At buildout (AFY)
Single-Family Residential	45 DU	138 gallons per unit per day	6,210	6.96
Landscaping	*Same as proposed Project*			17.07
			TOTAL	**24.03**

The proposed site is located within the IWA service area, where average baseline water demand in 2015 was 18,208 AFY and the projected water supply for 2040 is 42,910 AFY.[10] Alternative 1's water demand represents 0.13% of the IWA's 2015 baseline demand and less than 0.06% of the projected water supply for 2040. As identified for the proposed Project, a comparison of existing available water supplies and the water needs of Alternative 1 demonstrates that IWA has sufficient water supplies available to serve Alternative 1 in the future during normal, dry, and multiple dry years.

Future development under Alternative 1 will be subject to IWA's water conservation measures to control water usage and runoff. Based on these findings, this alternative will not substantially deplete groundwater supplies or interfere with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level. Similar to the proposed Project, impacts would be less than significant.

Alternative 2 (Suburban Neighborhood)

Alternative 2 would require a General Plan Amendment to increase the development potential on the subject property from a maximum buildout of 45 dwelling units to 361 dwelling units, a difference of 316 units over existing General Plan conditions. Alternative 2 would not propose new or revised goals, policies, or programs pertaining to water supply and would have no impact on existing General Plan goals, policies, or programs. Regardless of the land use designation, future development on the subject property would be subject to the same regulations and requirements regarding groundwater recharge.

The same water demand factors used to analyze the proposed Project in Section 2.12.6 were used to analyze impacts associated with the Alternative 2 GPA. The GPA associated with Alternative 2 would generate an additional water demand of 48.85 AFY compared to the existing land use designation for the Project site. The additional water demand represents less than 0.27% of IWA's 2015 water demand and approximately 0.11% of the projected water supply for 2040.

[10] Indio Water Authority 2015 Urban Water Management Plan Final Report, July 1, 2016.

Table 3.12-2
Additional Water Demand at the Alt 2 General Plan Amendment Buildout

Proposed Land Use	Maximum Units Allowed	Water Consumption Factor	Water Demand (gpd)	Total Water Demand At buildout (AFY)
Single-Family Residential	316 DU	138 gallons per unit per day	43,608	48.85

The Alternative 2 GPA would result in an increase in water demand for IWA from the increase in density (8 DU/AC) compared to the original designation (1 DU/AC) on which, in part, the IWA based its future water demand analysis when preparing its planning documents, including its Urban Water Management Plan. However, since the increase in water demand in 2040 would represent 0.11% of IWA's projected supply in 2040, the Alternative 2 GPA impacts associated with domestic water demand are expected to be largely consistent with those identified in the GPU EIR and less than significant with implementation of General Plan policies and existing regulations at all levels.

The same water demand factors used to analyze the proposed Project in Section 2.12.6 were used to analyze impacts associated with buildout of all 361 units under Alternative 2. Landscaping demand was estimated consistent with the proposed Project because no plans exist for landscaping of this Alternative. Since Alternative 2 would result in more units, and presumably less open space than the proposed Project, the use of this landscaping water demand is expected to be conservative, and overstates the likely demand. This alternative would generate a new water demand of 72.87 AFY, which is 39.88 AFY greater than the proposed Project's total water demand.

Table 3.12-3
Water Demand at Alt 2 Buildout

Proposed Land Use	Maximum Units Allowed	Water Consumption Factor	Water Demand (gpd)	Total Water Demand At buildout (AFY)
Single-Family Residential	361 DU	138 gallons per unit per day	49,818	55.80
Landscaping	*Same as proposed Project*			17.07
			TOTAL	**72.87**

The proposed site is located within the IWA service area, where average baseline water demand in 2015 was 18,208 AFY and the projected water supply for 2040 is 42,910 AFY.[11] Alternative 2's water demand represents approximately 0.4% of the IWA's 2015 baseline demand and less than 0.17% of the projected water supply for 2040. As identified for the proposed Project, a

[11] Indio Water Authority 2015 Urban Water Management Plan Final Report, July 1, 2016.

comparison of existing available water supplies and the water needs of Alternative 2 demonstrates that IWA has sufficient water supplies available to serve build out of Alternative 2 in the future during normal, dry, and multiple dry years.

This alternative will not substantially deplete groundwater supplies or interfere with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level. Similar to the proposed Project and Alternative 1, impacts would be less than significant.

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

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

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

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

iv) impede or redirect flood flows?

Alternative 1 (No Project/Existing General Plan)

Existing Drainage

The subject property is relatively flat with a manufactured hill on the west-central boundary and contains no rivers or streams. The site is currently draining from north to south at 0.3%. There is no existing storm drain system nearby. Development of Alternative 1 will increase impermeable surfaces on-site, and therefore increase on-site storm flows.

Proposed Drainage System

The City requires that all new development retain storm flows on site, and that it does not impact downstream properties. As with the proposed Project site plan, storm flows would be directed to streets, and drained to centralized retention basins, in a manner similar to the proposed Project. It would be expected that drainage quantities would be reduced, since the 45 homes would have larger yards and fewer impermeable surfaces. A final hydrologic analysis would be required to demonstrate that Alternative 1 meets the City's standards. These standard requirements will assure that impacts associated with storm water retention remain less than significant.

Best Management Practices

To reduce discharge of pollutants into stormwater runoff from the site, Alternative 1 would be required to implement Best Management Practices (BMPs) through the preparation and approval of a Water Quality Management Plan (WQMP) and Stormwater Pollution Prevention Program (SWPPP), both of which are requirements for the City's NPDES implementation. Implementation of BMPs would reduce pollutants of concern that may enter receiving retention basins and help reduce short and long-term water quality impacts caused by the construction and operation of the Alternative.

As with the proposed Project, Alternative 1's proposed grading/drainage design would be developed to limit the diversion of existing flow patterns and maintain the existing runoff conditions for overflow pathways to extend the feasibility for the developed site conditions. By implementing onsite retention, no significant impact to downstream water bodies is anticipated.

Approval of the WQMP, SWPPP, and the required BMPs will reduce impacts to surface waters by reducing siltation and eliminating pollutants in storm flows. With the implementation of this standard requirement, the impacts associated with surface water pollution under Alternative 1 would be less than significant.

Erosion and On- or Off-site Siltation

Adherence to City requirements, including WQMP BMPs, would ensure the Alternative 1 site design would not result in erosion or siltation on- or off-site. The City's requirements include BMPs for the control of silts and other contaminants in flood waters, which will be applicable to Alternative 1.

Summary

Alternative 1 will be required to comply with the City's storm water retention requirements, including the approval of a project-specific final hydrology study and WQMP prior to the issuance of grading permits. Implementation of these and other applicable requirements will assure that Alternative 1 would not create or contribute water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff.

Alternative 2 (Suburban Neighborhood)

The Alternative 2 General Plan Amendment would change the designation of the subject site to an existing land use designation, "Suburban Neighborhood" (0-8 DU/AC). As stated in the GPU EIR, development facilitated by the General Plan would allow for grading and construction in previously undeveloped areas, which may alter drainage patterns and/or result in an increase in impervious surfaces, thereby potentially increasing stormwater runoff. Increased stormwater runoff would have the potential to result in erosion or siltation, or exceed the capacity of the storm drain system and result in flood hazards on surrounding lands. The subject property is not located in or adjacent to a 100-year or 500-year floodplain designated by FEMA.

The General Plan Conservation, Infrastructure and Public Facilities, and Safety Elements include goals, policies, and programs to ensure that future development is reviewed for potential risks from altered drainage patterns, stormwater runoff, and stormwater management and design, and that impacts relative to flooding are taken into consideration and reduced or minimized to the fullest extent feasible in conjunction with future development. The General Plan policies require that future development is consistent with existing topography and drainage patterns, and ensure that new systems are properly designed to address stormwater drainage in conjunction with new development. The GPU EIR concluded that impacts from altered drainage patterns, stormwater runoff, and flooding would be less than significant with adherence to General Plan policies and existing federal, state, and local requirements.

While the Alternative 2 GPA would increase the allowable residential density on the Project site from 1 DU/AC to 8 DU/AC, future projects on the site would still be subject to General Plan policies and existing regulations as related to drainage, stormwater runoff, and flooding. Therefore, impacts regarding altered drainage patterns, stormwater runoff and flooding under the Alternative 2 GPA would be consistent with those identified in the GPU EIR and be less than significant.

Buildout of Alternative 2 would have similar impacts to the proposed Project and Alternative 1, as described below.

Proposed Drainage System

The City requires that all new development retain storm flows on site, and that it does not impact downstream properties. A hydrology study would be required for Alternative 2, to demonstrate that the site's design could meet City standards. Because of the intensity of development proposed under Alternative 2, it would be likely that on-site retention would be accomplished with a combination of surface retention basins and underground dry wells, which would likely be located under parking areas or other common area facilities. As with all other projects in the City, the hydrology study would be required to demonstrate, to the satisfaction of the City Engineer, that the Alternative would meet City standards. Although the drainage system would likely be more complex than that required for either the proposed Project or Alternative 1, impacts would remain less than significant, because of the City's standards and requirements.

Best Management Practices

Alternative 2 would be required to implement BMPs through the preparation and approval of a Water Quality Management Plan (WQMP) and Stormwater Pollution Prevention Program (SWPPP), both of which are requirements for the City's NPDES implementation. Implementation of BMPs would reduce pollutants of concern that may enter receiving basins or drywells and help reduce short and long-term water quality impacts caused by the construction and operation of Alternative 2.

As with the proposed Project, Alternative 2's proposed grading/drainage design would be developed to limit the diversion of existing flow patterns and maintain the existing runoff conditions for overflow pathways to extend the feasibility for the developed site conditions. By implementing onsite retention, no significant impact to downstream water bodies is anticipated.

Approval of the WQMP, SWPPP, and the required BMPs will reduce impacts to surface waters by reducing siltation and eliminating pollutants in storm flows. With the implementation of this standard requirement, the impacts associated with surface water pollution will be less than significant.

Erosion and On- or Off-site Siltation

Adherence to City requirements, including WQMP BMPs, will ensure the Alternative 2 site design will not result in erosion or siltation on- or off-site. The City's requirements include BMPs for the control of silts and other contaminants in flood waters, which will be applicable to Alternative 2.

Summary

Alternative 2 will be required to comply with the City's storm water retention requirements, including the approval of a project-specific final hydrology study and WQMP prior to the issuance of grading permits. Implementation of these and other applicable requirements will assure that Alternative 2 will not create or contribute water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff.

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

Alternative 1 (No Project/Existing General Plan)

Similar to the proposed Project, Alternative 1 would be designed to include facilities that will safely capture and convey stormwater runoff to properly designed retention facilities, where bio-infiltration will ensure that neither surface nor groundwater resources are adversely affected. As with the proposed Project, Alternative 1 would be designed in conformance with applicable water quality regulations of the City and the Regional Water Quality Control Board. A WQMP would be prepared that further ensures that Alternative 1 will not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. Impacts would be less than significant.

Alternative 2 (Suburban Neighborhood)

The Alternative 2 General Plan Amendment would change the designation of the subject site to an existing land use designation, "Suburban Neighborhood" (0-8 DU/AC). The General Plan includes policies and programs to ensure the implementation of a groundwater management plan and a water quality control plan. The GPU EIR determined that all future development projects would be required to comply with applicable state and local regulations that concern groundwater recharge, including the implementation of BMPs. While the Alternative 2 General

Plan Amendment would increase the allowable residential density on the Project site from 1 DU/AC to 8 DU/AC, future projects on the site would still be subject to General Plan policies and existing regulations at all levels. No significant impact would occur as a result of the Alternative 2 GPA regarding implementation of a water quality control plan or a sustainable groundwater management plan.

Buildout of Alternative 2 would be designed to include facilities that will safely capture and convey stormwater runoff to properly designed retention facilities, where bio-infiltration will ensure that neither surface nor groundwater resources are adversely affected. Alternative 2 would be designed in conformance with applicable water quality regulations of the City and the Regional Water Quality Control Board. A WQMP would be prepared that further ensures that Alternative 2 would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. Impacts would be less than significant.

3.12.4. Mitigation Measures

Impacts associated with both alternatives would be less than significant, and no mitigation measures would be required.

3.12.5. Environmental Superior Alternative

Overall, Alternative 1 would be the environmentally superior alternative because it would result in the lowest new water demand, smallest potential building footprints and smallest increase in impermeable surfaces. Between Alternative 2 and the proposed Project, the less intense proposed Project would be superior as it would result in lower new water demand and smaller building footprints.

3.13. Land Use / Planning

3.13.1. Introduction

This section of the EIR evaluates the compatibility of and potential impacts from implementation of the two Project alternatives. As with the proposed Project, the Alternatives' land use compatibility has been assessed using existing planning documents and land use regulations.

3.13.2. Existing Conditions

The Project site is designated Desert Estates Neighborhood on the City's General Plan Land Use Map, which allows low-density residential development at 1 du/ac and agricultural uses. The site is also located within the boundaries of the Southern Neighborhood Subarea, which is the area between the Central Neighborhoods and the Festival District and supports a rural/resort lifestyle in a quiet and secluded living environment. The City's Zoning Map currently designates the subject site as Country Estates Indio Ranchos Zone(s) (CEIR-1 & CEIR-2). The surrounding area is comprised of single-family residential and vacant land uses.

Please see Section 2.13 Land Use Planning for the full discussion of existing conditions and regulatory framework.

3.13.3. Alternatives Impact Analysis

b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

Alternative 1 (No Project/Existing General Plan)

Alternative 1 assumes the site would build out under the existing General Plan land use designation, "Desert Estates Neighborhood" (1 du/ac), and would have a maximum buildout potential of 45 single family dwelling units. Alternative 1 represents the continuation of existing conditions at the Project site and future development would be subject to existing General Plan goals and policies pertaining to land use planning.

By virtue of maintaining existing conditions, Alternative 1 is consistent with applicable land use goals and policies of the General Plan Land Use and Urban Design Element and other elements that address land use compatibility issues, including the Parks and Recreation, Health and Equity, Safety, and Conservation Elements. Alternative 1 is also consistent with the intent of the Southern Neighborhood Subarea and the Country Estates Indio Ranchos Zone, which serve to protect and promote the low-density, rural living environment. This Alternative would allow the infilling of a new residential neighborhood near neighborhood centers providing access to dining, shopping, and personal care services within walking and biking distance of the site (LU-1.1, LU-

1.3). Development of the site under existing conditions would be subject to project-level review by the City and would comply with GPU goals and policies pertaining to biological and cultural conservation, sustainable building design, energy and water efficiency, and public health and safety. The levels of service provided by local providers and infrastructure will assure that adequate levels of service are maintained and remain compatible with existing and planned land uses in the vicinity. Also see Sections 3.16: Public Services, 3.18: Transportation, and 3.20: Utilities and Service Systems.

Additionally, Alternative 1 would advance the efforts of the City's CAP to comply with State and regional efforts to reduce GHG emissions in accordance with SB 32 and SB 375. As discussed in Section 3.10, Alternative 1 has the higher per capita emission rate compared to the proposed Project and Alternative 2, however buildout of the site under Alternative 1 would result in per capita emissions consistent with the reduction targets set forth in the CAP. By complying with the CAP, Alternative 1 is consistent with the SCAG RTP/SCS, which is considered a supplemental plan governing land use and development in the region.

Unlike the proposed Project, Alternative 1 is consistent with Desert Estates Neighborhood designation assigned to the subject property on the Indio General Plan Land Use Map. Future development of the site can occur without the need for a GPA or specific plan, and maintains the original intent envisioned for the site as analyzed in the GPU EIR. In this way, Alternative 1 is environmentally superior to the proposed Project.

In summary, Alternative 1 will not conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Rather, it will maintain existing conditions of the Project site and future development would be subject to existing GPU goals and policies pertaining to land use planning. Therefore, impacts would be less than significant.

Alternative 2 (Suburban Neighborhood)

Similar to the proposed Project, Alternative 2 would include a General Plan Amendment which changes the designation of the site to "Suburban Neighborhood" (0-8 DU/AC), an existing land use in the General Plan and the next density level up from "Desert Estates Neighborhood." Maximum buildout potential under Alternative would result in 361 residential units, which is a 316-unit increase over current General Plan conditions.

As with the proposed Project and Alternative 1, future development of the site under the Alternative 2 land use designation would be subject to project-level review by the City and would need to comply with GPU goals and policies pertaining to biological and cultural conservation, sustainable building design, energy and water efficiency, and public health and safety. Project-level CEQA review would require analysis of potential impacts to these resources to ensure impacts are less than significant, or mitigated as appropriate.

As with the proposed Project and Alternative 1, this Alternative would also allow the infilling of a new residential neighborhood near neighborhood centers providing access to dining, shopping, and personal care services within walking and biking distance of the site (LU-1.1, LU-1.3). The

levels of service provided by local providers and infrastructure will assure that adequate levels of service are maintained and remain compatible with existing and planned land uses in the vicinity. The Alternative 2 GPA does not propose changes to existing General Plan goals or policies.

Additionally, Alternative 2 would advance the efforts of the City's CAP to comply with State and regional efforts to reduce GHG emissions in accordance with SB 32 and SB 375. As discussed in Section 3.10, GHG emissions resulting from buildout of Alternative 2 would result in a lower per capita emission rate, the basis of GHG emission reduction targets, when compared to the proposed Project and Alternative 1. By complying with the CAP, Alternative 2 is consistent with the SCAG RTP/SCS, which is considered a supplemental plan governing land use and development in the region.

The Suburban Neighborhood land use designation proposed under Alternative 2 allows for a residential density range of 0-8 du/ac, meaning there is a possibility that future development of the site would be consistent with the lower densities currently allowed on-site and in the surrounding neighborhoods. However, Alternative 2 has the potential to increase the site's residential density by 316 units, which is inconsistent with the intent of the Southern Neighborhood Subarea (GPU Policy LU-1.5 Subareas) and the Country Estates Indio Ranchos Zone, which serve to protect and promote the low-density, rural living environment. Thus, buildout of Alternative 2 could constitute a change in character compared to the General Plan, particularly in regard to the rural, low-density residential vision of the Southern Neighborhood Subarea. Based on these findings, Alternative 2 would have greater impact on land use and planning than both the proposed Project and Alternative 1, and impacts are potentially significant.

3.13.4. Mitigation Measures

Alternative 1 would be consistent with the General Plan and GPU EIR, would have less than significant impacts on land use and planning, and would not require mitigation. Buildout of Alternative 2 would result in significant impacts associated with land use compatibility. It is unlikely that mitigation measures could be feasibly implemented, and impacts would remain significant and unavoidable.

3.13.5. Environmentally Superior Alternative

Alternative 1 would cause no significant environmental impact due to a conflict with a land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Alternative 2 would result in the greatest level of impacts due to the increase in residential density and inconsistency with the intent of the Southern Neighborhood Subarea, and could potentially result in significant impacts requiring either mitigation or project denial during the City review process.

Of the three alternatives, Alternative 1 would be the environmentally superior alternative because it would maintain existing conditions of the Project site and be most compatible with the Southern Neighborhood Subarea's vision for low-density, rural living.

3.14. Noise

3.14.1. Introduction

This section addresses the short and long term impacts associated with noise generated by project alternatives. The analysis below is based on the findings of the noise impact analysis provided for the proposed Project[12], from which noise impacts have been extrapolated for the two alternatives described below.

3.14.2. Existing Conditions

Noise levels at the site are currently influenced primarily by traffic on Avenue 50. Noise monitoring conducted at the site found that current noise levels are low and well within acceptable ranges, except for locations immediately adjacent to the site, where traffic noise increases noise levels.

Please see Section 2.14 for a detailed description of existing noise conditions at the subject property.

3.14.3. Alternatives Impact Analysis

a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies;

Alternative 1 (No Project/Existing General Plan).
Development of Alternative 1 would result in 45 single family homes, and would be consistent with the development identified for the site in the General Plan EIR. Build out of Alternative 1 would cause both construction noise and permanent noise increases associated with the long term life of the project.

Construction noise would result from the use of heavy equipment to grade the site, and to build the roads, homes and common area improvements that would be required for a single family subdivision. As with other projects of similar densities in the area of the site, it would be expected that Avenue 50 would be fully improved, and that Alternative 1 development would include perimeter walls and individual walls around each home. Because the entire site would be graded, it would be expected that grading noise levels would be equivalent to noise levels generated by grading activities associated with the proposed Project, and that like the proposed Project, the impacts of grading activities would be less than significant. Construction of homes, paving of streets, and completion of other improvements would result in somewhat lower noise levels, insofar as fewer homes would be constructed and construction activity would be reduced.

[12] Noise Impact Analysis Ventana, prepared by KW Air Quality and Noise LLC, February 18, 2021.

Therefore, construction noise levels would likely be lower than those associated with the proposed Project, and would remain less than significant.

Noise generated during the life of the project will primarily be associated with the traffic generated by Alternative 1. Since this alternative would result in fewer homes, it would also be expected to generate less traffic. Based on the proposed Project traffic impact analysis, a single family home generates 9.44 daily trips. Alternative 1 would therefore generate a total of 425 daily trips. These trips, and the noise they generate, were considered in the GPU EIR, since Alternative 1 would implement the current land use designation on the site. According to the General Plan EIR, Avenue 50 between Jefferson Street and Madison Street currently experiences noise levels of 68 dBA CNEL at 50 feet from the centerline, without mitigation. A project developed under the existing General Plan designation would be expected to widen Avenue 50 to its full half paved section of 50 feet, and would also be expected to install sidewalks, parkway landscaping and a perimeter wall at the property line. On that basis, the closest residential unit would occur more than 100 feet from centerline. The installation of a perimeter wall, and the more than doubling of distance from the noise source would result in reductions of 10 to 12 dBA at this closest potential residence, which would result in noise levels below the City's acceptable standard for residential units. Therefore, long term noise impacts resulting from traffic on surrounding streets would be less than significant.

Noise levels on the site would be typical of noise levels in any residential subdivision, and would include daily activities of residents, vehicle trips in and out of the project, and landscaping equipment noise. None of these activities or noise sources would be substantial, and impacts associated with noise emanating from the site after its build out would be less than significant, and because of the lower number of units, less than the noise levels generated on-site by either the proposed Project or Alternative 2.

Alternative 2 (Suburban Neighborhood).

Alternative 2 would require a General Plan Amendment to Suburban Neighborhood, and would result in the development of 361 housing units, likely attached condominiums, townhomes or apartments. Any project developed under this alternative would be expected to widen Avenue 50 to its full half width, and to provide parkway landscaping and a perimeter wall. As described in Section 3.18, below, Alternative 2 would result in up to 3,408 daily trips, and with improvements in acceptable Levels of Service on surrounding streets.

Construction noise would result from the use of heavy equipment to grade the site, and to build the roads, homes and common area improvements that would be required for a condominium or apartment project. Because the entire site would be graded, it would be expected that grading noise levels would be equivalent to noise levels generated by grading activities associated with the proposed Project, and that like the proposed Project, the impacts of grading activities would be less than significant. Construction activity for the 361 units would be expected to be more intense than that associated with either Alternative 1 or the proposed Project. However, construction activities would be required to implement the BMPs included in Mitigation Measure

NOI-1, including prohibitions on idling, location of stationary equipment away from sensitive receptors, and limits on construction hours. With implementation of this mitigation measure, it would be expected that impacts associated with construction noise, although higher than the proposed Project, would remain less than significant and would not reach the 80 dBA L_{eq} FTA standard.

Operational noise would be associated with the noise created by vehicle trips on surrounding streets. As identified in Section 2.14, noise level increases associated with the proposed project will range from 0.0 to 0.2 dBA on surrounding streets, with the addition of 972 daily trips in the opening year (2022), and similar increases at General Plan build out (2040). Alternative 2 would generate 3.5 times the number of vehicles on surrounding streets, and could therefore increase noise levels by a similar amount, which would represent an increase of up to 0.7 dBA on surrounding streets. This level of increase would not be perceptible to the human ear, and would not result in significant noise impacts on surrounding streets.

Noise levels on the site would be typical of noise levels in any residential subdivision, and would include daily activities of residents, vehicle trips in and out of the project, and landscaping equipment noise. None of these activities or noise sources would be substantial, and impacts associated with noise emanating from the site after its build out would be less than significant, and would be expected to be greater than either the proposed project or Alternative 1, based on project intensity.

b) Generation of excessive groundborne vibration or groundborne noise levels;

Alternative 1 (No Project/Existing General Plan).

Alternative 1 would result in the development of 45 single family homes, and associated streets, perimeter walls and retention areas/common open space. These activities would have the potential to generate ground vibration and noise, in a manner similar to the proposed Project, insofar as the entire site would be graded, and interior streets and Avenue 50 would need to be paved. As described in Section 2.14, the Caltrans standard of 0.2 inches-per-second peak particle velocity (PPV) for both building damage and annoyance of nearby sensitive receptors is the standard used, because the City does not have a standard for groundborne vibration or noise.

The highest degree of groundborne vibration would be generated during the paving phase of construction, due to the operation of a vibratory roller. Vibration velocities from vibratory roller operations are estimated to be approximately 0.1980 inch-per-second PPV at 26 feet from the source of activity.[13] Therefore, structures located more than 26 feet from vibratory roller operations would not experience groundborne vibration above the Caltrans significance threshold of0.2 inch-per-second PPV. Under Alternative 1, and similar to the proposed Project, the nearest structures to the site are located approximately 50 feet from any area where streets would be likely to occur. Therefore, the Caltrans significance thresholds would not be exceeded,

[13] Federal Transit Administration, *Transit Noise and Vibration Impact Assessment Manual*, September 2018.

and impacts associated with vibration as they relate to adjacent sensitive receptors would be less than significant under Alternative 1.

Alternative 2 (Suburban Neighborhood).

Under Alternative 2, a General Plan Amendment would result in the construction of up to 361 attached residential units. As with both Alternative 1 and the proposed project, grading, paving and construction activities would have the potential to create groundborne vibration. In the case of Alternative 2, more streets and driveways would be likely, since the project would result in substantially more units than either Alternative 1 or the proposed Project, and these structures would require access and parking areas. However, as is the case with the other two alternative projects, structures are located at least 50 feet from any likely area of paving activity, and although such activity would likely be of longer duration, the Caltrans standard of 0.2 inches-per-second peak particle velocity (PPV) for both building damage and annoyance of nearby sensitive receptors would not be exceeded. Therefore, although longer periods of groundborne vibration and noise could occur under Alternative 2 to accommodate greater areas of streets, driveways and parking areas, the impacts would remain less than significant.

3.14.4. Mitigation Measures

Both Alternative 1 and Alternative 2 would be required to implement Mitigation Measure NOI-1 during all construction activities. With implementation of these BMPs, impacts associated with construction noise would be reduced to less than significant levels under both alternatives. Impacts associated with operation of both alternatives would be less than significant, and would not require mitigation.

3.14.5. Environmental Superior Alternative

Alternative 1 would generate the fewest number of trips on surrounding roadways, and the least amount of development on the Project site. As a result, Alternative 1 would also generate lower noise levels than either the proposed Project or Alternative 2, although all three alternatives would result in less than significant impacts with the implementation of Mitigation Measure NOI-1.

3.15. Population and Housing

3.15.1. Introduction

This section of the EIR analyzes the potential population, housing, socio-economic, and environmental justice impacts associated with the Project alternatives.

3.15.2. Existing Conditions

Project Area

The Indio population was 90,751 in 2020,[14] and it is expected to reach 129,300 by 2045.[15] The local housing market includes a mix of single- and multi-family dwelling units and mobile homes. In 2020, there were 32,539 housing units in Indio, the majority (68.3%) of which were single-family detached units.[16] The average household size is 3.31 persons per household, and vacancy rate (16.6%) is relatively low compared to other cities in the Coachella Valley, which are generally more influenced by the tourism industry. [17]

The largest sector (20.2%) of the City's civilian labor force is employed in "educational services, health care, and social assistance," followed by "arts, entertainment, recreation, accommodation, food services" which employs 18.3% of the labor force.[18] The City's 2019 annual average unemployment rate was 5.3%,[19] and the median household income is $53,669.[20]

The subject property is vacant and was used for agriculture. No housing, population, or employment is located onsite. The site is generally surrounded by single family detached homes on all sides.

3.15.3. Alternatives Impact Analysis

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)?

[14] Report E5: City/County Population and Housing Estimates, January 1, 2020, CA Dept. of Finance.
[15] 2045 Forecast: Tables 13 and 14, Current Context Demographics and Growth Forecast Technical Report, 2020-2045 RTP/SCS, adopted on September 3, 2020, Southern California Association of Governments.
[16] Report E5: City/County Population and Housing Estimates, January 1, 2020, CA Dept. of Finance.
[17] Ibid.
[18] Table S2403, 2019 American Community Survey 5-Year Estimates.
[19] "Monthly Labor Force Data for Cities and Census Designated Places (CDP), Annual Average 2019-Revised, Data Not Seasonally Adjusted," California Employment Development Department.
[20] 2019 American Community Survey 5-Year Estimates.

Alternative 1 (No Project/Existing General Plan)

Alternative 1 would keep the existing General Plan land use designation (Desert Estates Neighborhood, up to 1 DU/AC) for the Project site and result in a maximum buildout of 45 dwelling units. Based on an average household size of 3.31 persons, build out of Alternative 1 could result in a population of 149.[21] This represents less than 0.12% of Indio's projected 2045 population of 129,300, and was accounted for in the GPU EIR. The increase will not represent substantial population growth in the area, and the proposed residential units would accommodate the new population anticipated in growth forecasts.

As discussed in Section 2.15.6, the site is located on existing streets, and utilities and public facilities are available in the immediate area. Buildout of the subject property would require parcel-level utility extensions and internal roads, but they would serve only the subject site and not induce population growth in the area. Impacts will be less than significant on inducing population growth in the area.

Alternative 2 (Suburban Neighborhood)

Similar to the proposed Project, Alternative 2 would include a General Plan Amendment which changes the designation of the site to "Suburban Neighborhood" (0-8 DU/AC), an existing land use in the General Plan and the next density level up from "Desert Estates Neighborhood." Maximum buildout potential under Alternative 2 would result in 361 residential units, or 316 more than currently anticipated by the General Plan. Alternative 2 would cover the same land as Alternative 1 or the proposed Project, but result in more residential units.

Based on an average household size of 3.31 persons, buildout of Alternative 2 with 316 more units could result in 1,046 more residents than buildout of the current General Plan.[22] According to the GPU EIR, buildout of the General Plan would result in a projected population of 119,951 by 2040. This projection assumed the Project site would develop at Desert Estates Neighborhood densities. With implementation of Alternative 2, the buildout population could increase by 1,046 residents for a total buildout population of 120,997, which still represents less than the 2040 population projection of 123,300 developed by SCAG.[23] The direct growth impacts of Alternative 2 are within regional forecasts and, therefore, impacts will be less than significant.

The GPU EIR stated that residential and mixed-use land use designations in the General Plan provide adequate housing capacity to accommodate population growth and meet the City's RHNA of 3,025 additional residential units for SCAG's Fifth RHNA Cycle (2014–2021). The addition of 316 units allowed by Alternative 2 would have a beneficial impact on the City housing supply and would not adversely impact the City's ability to meet its RHNA requirements.

[21] Report E-5: City/County Population and Housing Estimates, January 1, 2020, California Department of Finance.
[22] Report E-5: City/County Population and Housing Estimates, January 1, 2020, California Department of Finance.
[23] Table 11, Demographics & Growth Forecast Appendix, 2016-2040 RTP/SCS, Southern California Association of Governments, adopted April 2016.

According to the GPU EIR, the City is not expected to experience indirect growth inducement beyond the growth forecast for the GPU through infrastructure improvements, as the City is already served by essential public services. The site is accessed by existing streets, and utilities and public facilities are available in the immediate area. Therefore, potential impacts of Alternative 2 on indirect growth inducement would be less than significant and consistent with the current General Plan.

Overall, Alternative 2 would result in less than significant impacts on population growth, but at a slightly higher level compared to the proposed Project.

3.15.4. Mitigation Measures

Impacts would be less than significant, and no mitigation measures would be required.

3.15.5. Environmental Superior Alternative

Alternative 1 would result in the lowest number of housing units and the least population growth. In this regard, Alternative 1 is the environmentally superior alternative.

3.16. Public Services

3.16.1. Introduction

This analysis evaluates the potential for the Project alternatives to affect public services during construction and operational phases. The analysis considers whether construction and/or operation of the alternatives would affect the ability of fire, police, school, park, or other public service providers to maintain acceptable levels of service or other performance objectives and result in the need for new or expanded facilities.

3.16.2. Existing Conditions

Fire protection and emergency medical services to the City of Indio are provided by the Indio Fire Department. Police protection in Indio is provided by the Indio Police Department. Coachella Valley Unified School District (CVUSD) serves the Project area, and some of its facilities are slightly over capacity.

Please see Section 2.16.4 and Section 2.16.5 for a detailed description of existing conditions of public services.

3.16.3. Alternatives Impact Analysis

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 (see Section 3.17)***
- ***Other Public Facilities***

Alternative 1 (No Project/Existing General Plan)

Alternative 1 would keep the existing General Plan land use designation (Desert Estates Neighborhood, up to 1 DU/AC) for the site and result in a maximum buildout of 45 dwelling units, which is 58 units fewer than the proposed Project. Based on an average household size of 3.31 persons, build out of Alternative 1 could result in a population of 149.[24]

[24] Report E-5: City/County Population and Housing Estimates, January 1, 2020, California Department of Finance.

Fire Protection

The impacts associated with Alternative 1 were assessed in the GPU EIR, because Alternative 1 represents build out of the property under General Plan land use designations. According to that analysis, implementation of the General Plan would result in less than significant impacts on the provision of fire protection in the City, with implementation of General Plan policies. Under Alternative 1, the 45 single family homes would be required to comply to Safety Element policies, including the use of fire-resistant materials and compliance with the Uniform Fire Code.

In addition to compliance and consistency with General Plan policies, any project built under Alternative 1 will be required to pay the City's development impact fees for fire facilities and apparatus. This fee requires new development to pay its fair share of future facilities.

In accordance with standard City practices, the Fire Department would review project plans before permits are issued to ensure that adequate fire and safety measures are incorporated into Alternative 1 in compliance with all applicable state and city fire safety regulations. Emergency access would be provided consistent with Fire Department requirements.

Because Alternative 1 is consistent with the land use and intensity identified in the GPU EIR, and will be required to comply with City standards, it is not anticipated to generate substantial additional demand for fire protection services, and would not result in the need for new or expanded facilities. Therefore, Alternative 1's potential impact on fire protection services will be less than significant.

Police Protection

Construction of Alternative 1 will result in a potential increase in the need for security to prevent theft or vandalism of construction activities and equipment. However, this potential impact will be minimized through compliance with standard safety measures, such as fencing and locking work areas, vehicle staging, and storage areas at the end of each workday, providing security lighting, minimizing "dead zones," and providing professional security personnel, if needed. With implementation of these measures, impacts associated with public safety during construction of Alternative 1 will be reduced to less than significant levels.

During operation, Alternative 1 will result in a marginal increase in demand for police services for the protection of 45 residential units and an estimated 149 additional persons. As described above, the intensity of development resulting from Alternative 1 would be consistent with that considered as part of the General Plan's buildout, and would be expected to be less than significant, as identified in the GPU EIR, with the implementation of General Plan policies and standard requirements. The subject site vicinity is currently patrolled and will continue to be patrolled after the development of Alternative 1. Police personnel will be able to access the site using Avenue 50. Alternative 1 will be required to comply with all Police Department regulations and procedures.

Alternative 1 is not expected to require construction of new or expanded police services or facilities and impacts on police protection services will be less than significant.

Schools

As of January 2020, approximately 17,495 students are enrolled in the CVUSD system, with excess capacity at the elementary and high school levels. Full buildout of Alternative 1 will result in 45 single-family residential units. Based on CVUSD student generation rates shown below, Alternative 1 has the potential to generate approximately 34 kindergarten through twelfth grade students. The potential student increase represents around 0.19% of CVUSD's current student body.

Table 3.16-1
Alternative 1 – Estimated Student Generation

School Type	Generation Rate (per residential unit)	Project's Student Generation
Elementary School	0.3974	18
Middle School	0.1207	6
High School	0.2058	10
Total:	----	34

Source: Coachella Valley Unified School District - Fee Justification Study for New Residential and Commercial/Industrial Development, Table VI District-Wide Student Generation Rate (May 2020) and Project materials.

As discussed in Section 2.16.6, Alternative 1 will be subject to the CVUSD developer fees in place at the time development occurs, which currently stand at $4.08 per square foot on all new residential construction.[25] 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, Alternative 1 impacts to school services would be less than significant.

Other Public Facilities

Buildout of Alternative 1 will result in an additional 149 residents (assuming full occupancy) and thus a marginal increase in need for the local library and/or other public facilities. Under the City's Developer Impact Fees ordinance (Indio Municipal Code Section 33.065 et seq), each new unit must pay "Public Building Fees" to be used for public buildings, including additions to libraries. The use of public facilities by Alternative 1 residents will be consistent with that analyzed in the GPU EIR, and is not expected to require new or expanded facilities that could result in adverse environmental impacts. With the payment of applicable impact fees, Alternative 1 related impacts to other public facilities will be less than significant.

[25] School /Developer Fees, Coachella Valley Unified School District, effective 8/10/2020.

Alternative 2 (Suburban Neighborhood)

Alternative 2 would include a General Plan Amendment which would change the designation of the site to "Suburban Neighborhood" (0-8 DU/AC), an existing land use in the General Plan and the next density level up from "Desert Estates Neighborhood." Maximum buildout potential under Alternative 2 would result in 361 residential units, or 316 more units than considered in the GPU EIR.

Fire Protection

The City's General Plan Update EIR concluded that adherence to the goals and policies of the General Plan Update would ensure that impacts associated with the provision of new or physically altered fire facilities would be less than significant (Page 4.14-19). Alternative 2 will apply an existing residential designation, Suburban Neighborhood (allowing up to 8 DU/AC), to the 45.17-acre site. The GPA would increase the allowable density from 1 DU/AC of the current Desert Estates designation; however, the permitted land use (primarily single-family residential) would remain unchanged. At maximum buildout under the proposed Suburban Neighborhood designation, 361 units, or 316 units more than the current General Plan could be developed on the subject site, potentially resulting in an increase of approximately 1,046 residents at build out (see Section 3.15). Despite the increase in density, future development on the Project site under the proposed designation would still be subject to all GPU policies and programs and other standard requirements, as discussed in Section 2.16.6.

Construction of Alternative 2 will result in a marginal potential increase in fire and medical response demand associated with construction activities and equipment. However, the Fire Code requires that water connections be available prior to the initiation of construction, thereby minimizing potential fire risks. Potential risks will end once construction is complete.

Over the long term, operation of Alternative 2 will increase the demand for fire services in the City due to 361 new residential units. Development under this alternative will be required to pay the City's development impact fees for fire facilities and apparatus. This fee requires new development to pay its fair share of future facilities.

In accordance with standard City practices, the Fire Department would review project plans before permits are issued to ensure that adequate fire and safety measures are incorporated into Alternative 2 in compliance with all applicable state and city fire safety regulations. Emergency access will be provided to the site via the existing public roadway network (Avenue 50) and onsite roads.

Because Alternative 2 will be required to comply with General Plan policies and City standards and is not anticipated to generate substantial additional demand for fire protection services, it would not result in the need for new or expanded facilities. Therefore, Alternative 2's potential impact on fire protection services will be less than significant.

Police Protection

As discussed in Section 2.16.6, the GPU EIR concluded that adherence to GPU policies would reduce impacts associated with the provisions for additional police services. The General Plan Safety Element includes goals and policies to ensure acceptable response times, police staffing levels, and environmentally sustainable infrastructure and facilities. Maximum buildout under Alternative 2 would result in 361 units, an additional 316 units and potentially 1,046 additional residents on the Project site when compared to the General Plan build out, and would increase the demand for police services compared to that analyzed in the GPU EIR.

Construction of Alternative 2 will result in a potential increase in the need for security to prevent theft or vandalism of construction activities and equipment. However, this potential impact will be minimized through compliance with standard safety measures, such as fencing and locking work areas, vehicle staging, and storage areas at the end of each workday, providing adequate nighttime lighting, minimizing "dead zones," and providing professional security personnel, if needed. With implementation of these measures, impacts associated with public safety during construction of Alternative 2 will be reduced to less than significant levels.

Alternative 2 will result in a marginal increase in demand for police services for the protection of 361 residential units. The subject site vicinity is currently patrolled and will continue to be patrolled after Alternative 2 development. Police personnel will be able to access the site using Avenue 50. Alternative 2 will be required to comply with all Police Department regulations and procedures.

While the demand for police protection services under Alternative 2 may be slightly higher than the proposed Project due to the higher number of units and residents, Alternative 2 is not expected to require construction of new or expanded police services or facilities and impacts on police protection services will be less than significant.

Schools

According to the GPU EIR, CVUSD anticipates that new school construction would be required in order to accommodate additional future students within the City. CVUSD will continue to collect school impact fees from developers, and pursuant to SB 50 and AB 2926, these fees are considered to fully mitigate school capacity-related impacts. New development in the General Plan area would occur over time, and student populations are expected increase gradually. CVUSD has a facility master plan that forecast for new school sites as population within their respective boundaries increases.

As of January 2020, approximately 17,495 students are enrolled in the CVUSD system, with excess capacity at the elementary and high school levels. Full buildout of Alternative 2 will result in 361 single-family residential units. Based on CVUSD student generation rates shown below, Alternative 2 has the potential to generate approximately 263 kindergarten through twelfth grade students. The potential student increase represents about 1.5% of CVUSD's current student body.

Table 3.16-2
Alternative 2 – Estimated Student Generation

School Type	Generation Rate (per residential unit)	Project's Student Generation
Elementary School	0.3974	144
Middle School	0.1207	44
High School	0.2058	75
Total:	----	263

Source: Coachella Valley Unified School District - Fee Justification Study for New Residential and Commercial/Industrial Development, Table VI District-Wide Student Generation Rate (May 2020) and Project materials.

Consistent with the proposed Project and Alternative 1, Alternative 2 will be subject to the CVUSD developer fees in place at the time development occurs, which currently stand at $4.08 per square foot on all new residential construction.[26] 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, Alternative 2 impacts to school services would be less than significant.

Other Public Facilities

According to the GPU EIR, the GPU Infrastructure and Public Facilities Element and Land Use and Urban Design Element provide policies to ensure the development of necessary public facilities and services for the City at General Plan buildout. Furthermore, under the City's Developer Impact Fee ordinance, each new residential unit must pay "Public Building Fees" to be used for public buildings, including additions to libraries. The County is responsible for new library facilities in the region, and the GPU policies and the City's Developer Impact Fee ordinance can aid the County in the planning and funding of future local libraries. The GPU EIR concluded that impacts associated with the provision of new or physically altered library facilities would be less than significant. Because Alternative 2 would result in a limited increase in population of an estimated 1,046 residents at maximum buildout, and GPU policies and developer impact fees would continue to apply to the subject site, impacts of Alternative 2 on public facilities will be less than significant.

3.16.4. Mitigation Measures

Impacts to public services would be less than significant, and no mitigation measures would be required.

[26] School /Developer Fees, Coachella Valley Unified School District, effective 8/10/2020.

3.16.5. Environmental Superior Alternative

With regard to impacts on public services and facilities, Alternative 1 is superior to the other alternatives because it will result in the least number of dwelling units and number of residents, and thus the lowest level of impacts on public services. Between the proposed Project and Alternative 2 (Suburban Neighborhood), the less intense proposed Project would result in a lower level of impacts because it would generate a lower number of units and residents. Under all alternatives, impacts to public services are expected to be less than significant.

3.17. Recreational Resources

3.17.1. Introduction

This section of the EIR analyzes the potential impacts on recreational resources including parks and recreational facilities in the City associated with the Project alternatives.

3.17.2. Existing Conditions

The City's Public Works Department, Parks & Facilities Division is responsible for maintaining parks while the Desert Recreation District (DRD) is responsible for providing recreational facilities throughout the City.

In addition to a municipal golf course, there are 14 existing City parks and two dog parks distributed throughout Indio, which total 63 acres in area. In addition to these parks, the Desert Recreation District operates the Indio Community Center and Park. There are pedestrian, equestrian, and bike trails throughout the City.

Please see Section 2.17 for a detailed description of existing conditions of recreational resources.

3.17.3. Alternatives Impact Analysis

a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated.

Alternative 1 (No Project/Existing General Plan)

Alternative 1 would keep the existing General Plan land use designation (Desert Estates Neighborhood, up to 1 DU/AC) for the Project site and result in a maximum buildout of 45 dwelling units, which would be consistent with the level of development analyzed in the GPU EIR. Development of 1 acre lots in the vicinity of the site has not generated substantial recreation space, in part or in whole due to the larger lots and related on-lot recreational opportunities, but could generate open space/retention areas.

The site is located in southwest Indio and in relatively close proximity to existing parks and recreational facilities. It is approximately 0.8 miles southwest of Hjorth Street Park, and approximately 1.7 miles south of Shields Park. Existing and planned bike paths extend along major roadways in the Project area, including Avenue 50, Jefferson Street and Madison Street. There are existing trails along Avenue 50, Madison Street and Avenue 49 in the vicinity.

Based on an average household size of 3.31 persons, build out of Alternative 1 could result in a population of 149.[27] Residents would be expected to utilize onsite recreational amenities as well as local and regional recreational facilities. Alternative 1 was considered in the General Plan Update, and will not induce substantial population growth that will result in significant impacts to existing neighborhood and regional parks or other recreational facilities. Alternative 1 will not require the development of new parks or recreational facilities, or the expansion of existing facilities to support future residents. Impacts to parks and recreational facilities will be less than significant.

Alternative 2 (Suburban Neighborhood)

Maximum buildout potential under Alternative 2 would result in 361 residential units. According to the GPU EIR, as of 2018, the City is deficient in parkland acreage and would require a net increase of approximately 297 acres of parkland to be developed and maintained by the City to meet the standard of 3.0 acres per 1,000 residents. The City would need to work toward identifying future planned parks in conjunction with future development. As detailed in the General Plan, the City has identified future park and trail improvement, expansion, and construction projects, including expansion of Dr. Carreon Park and a new neighborhood park located south of Avenue 49 and west of Monroe Street.

Despite the current deficit in park acreage, compliance with the goals, policies, and implementation actions set forth in the General Plan and completion of the CV Link would improve park and recreation facilities to meet the demands associated with growth. The GPU EIR concluded that with these planned improvements, forecast growth under the General Plan would not result in substantial physical deterioration of park and recreational facilities. In addition, all new development must provide parkland or in-lieu fees, as required by the Municipal Code.

Alternative 2 would allow up to 361 single-family detached dwelling units on the Project site at buildout, an increase of 316 units compared to the current designation. Based on an average household size of 3.31 persons, full buildout of Alternative 2 could result in 1,046 more residents than buildout of the current General Plan.[28] This represents a less than 1% increase in build out population, and on associated usage of park and recreation facilities compared to that anticipated in the General Plan. Potential impacts would be reduced in several ways. Under the proposed “Suburban Neighborhood” designation, future projects on the site would still be required to provide parkland or in-lieu fees, as well as park and recreation Development Impact Fees, as required by the Municipal Code. The General Plan describes Suburban Neighborhoods as having generous streetscapes and landscaped front yards, and also neighborhood parks, linear parks, greenways, trails, and other park types. Future development would be required to comply with this requirement. While Alternative 2 may result in slightly more usage of City parks and recreational facilities, impacts are expected to be largely consistent with those identified in the GPU EIR and would remain less than significant with implementation of standard requirements.

[27] Report E-5: City/County Population and Housing Estimates, January 1, 2020, California Department of Finance.
[28] Ibid.

To meet the 3 acres per 1,000 residents City standard within the subject property, Alternative 2 would need to provide approximately 3.59 acres of landscaped/open areas, which would be feasible on the 45.17-acres subject property with attached single-family homes, or through the payment of in-lieu fees.

Alternative 2 will not require the development of new parks or recreational facilities, or the expansion of existing facilities to support future residents. Impacts to parks and recreational facilities will be less than significant.

b) Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.

Alternative 1 (No Project/Existing General Plan)

As discussed above, Alternative 1 would likely result in development consistent with that analyzed in the GPU EIR, and in some open space amenities on-site. The provision of open space would be consistent with the requirements of the Zoning Ordinance for residential projects. No construction or expansion of off-site parks or recreational facilities will be required for Alternative 1. On-site recreational improvements under Alternative 1 will be subject to design review and physical inspection by the City. Impacts will be less than significant.

Alternative 2 (Suburban Neighborhood)

The General Plan identified future park and trail improvement/expansion/construction projects, including expansion of Dr. Carreon Park and a new neighborhood park located south of Avenue 49 and west of Monroe Street near the site.

Regardless of the land use designation, future projects on the site will be required to provide parkland or in-lieu fees, and park and recreation Development Impact Fees, as required by the Municipal Code, and abide by other applicable City regulations on recreational facilities. Alternative 2 would not result in new or expanded parks or recreational facilities that would have an adverse physical impact on the environment. Development plans and completed recreational improvements would be subject to standard City reviews and inspections to assure they are safely designed and built. Impacts will be less than significant and addressed at project-level environmental review for future recreational facility development. Recreational improvements under Alternative 2 will be subject to design review and physical inspection by the City. Impacts will be less than significant.

3.17.4. Mitigation Measures

Impacts associated with parks and recreational facilities will be less than significant, and no mitigation measures are required.

3.17.5. Environmental Superior Alternative

Alternative 1 would result in the lowest number of housing units and the least population growth. Therefore, Alternative 1 would result in the least increase in usage of City parks and recreational facilities. In this regard, Alternative 1 is the environmentally superior alternative.

3.18. Transportation and Traffic

3.18.1. Introduction

This Section considers the impacts of each of the alternatives on traffic and alternate transportation in the vicinity of the Project site, based on the traffic generated by each alternative.

3.18.2. Existing Conditions

Jefferson Street is the only arterial in the vicinity of the Project. Other main roadways in the area are designated as Boulevard, including Avenue 48, Avenue 50, Madison Street, and Monroe Street.

Avenue 50 between Jefferson Street and Madison Street has two eastbound lanes and one westbound lane, divided by a continuous center left-turn lane. Avenue 50 from Madison Street to Monroe Street is two lanes divided by a continuous center left-turn lane. East of Monroe Street, Avenue 50 has two westbound lanes and a single eastbound lane, divided by a continuous center left-turn lane. Avenue 50 is designated a Boulevard in the City's General Plan.

The GPU EIR found that under existing conditions (2019) throughout the City, four roadway segments and four intersections operated at LOS E or lower. Of these segments and intersections, Madison Street and Avenue 50 is the only intersection in the Project area. It operated at LOS D in the PM peak hour, but is reduced to LOS E in the AM peak hour, according to the GPU EIR's analysis. At the time of the analysis, this intersection operated with a 4-way stop sign. Since that time, a traffic signal has been installed.

Existing weekday average daily traffic (ADT) volumes on roadways in the study area are shown on Exhibit 2.18-1. Avenue 50 currently carries 10,800 ADT east of Jefferson Street, and 10,300 ADT west of Madison Street in the vicinity of the project site. Under existing conditions, all study area intersections operate at LOS C or better.

3.18.3. Alternatives Impact Analysis

a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities.

Alternative 1 (No Project/Existing General Plan)

Alternative 1 would result in build out of the current land use designation for the site, and a maximum of 45 dwelling units. Using the same trip generation per unit as that used in the traffic study, Alternative 1 would generate 425 daily trips on area roadways.

This alternative was included in the GPU EIR's analysis of future conditions, insofar as its density and land use are consistent with the Desert Estates Neighborhood designation applied to the site. According to the GPU EIR, Table 4.15-2, the segment of Avenue 50, between Jefferson Street and Madison Street, would operate at LOS A at General Plan buildout, as would all other segments of Avenue 50. The GPU EIR also determined, as shown on Table 4.15-3, that the intersection of Jefferson Street and Avenue 50 would operate at LOS D during both the morning and evening peak hours at General Plan build out; and that the intersection of Madison Street and Avenue 50 would operate at LOS C during the morning and evening peak hours, with improvements.

The Project-specific traffic study (Appendix K), considered localized impacts with and without the Project. Under Opening Year conditions, the traffic study found that all intersections operate at acceptable levels of service, with or without the proposed Project. Since Alternative 1 would result in 425 trips, rather than the 972 trips estimated for the Project, Alternative 1 would result in less than significant impacts in Opening Year on area intersections.

Under the without Project conditions in 2040, all local intersections operate at acceptable levels of service, with the exception of the intersection of Hjorth Street and Avenue 50, which would operate at LOS F in the morning peak hour. With implementation of Alternative 1, and the lower traffic it would generate, this intersection would still operate at unacceptable levels, and would require the installation of a traffic signal unrelated to any project on the site. Alternative 1 would contribute to this signal consistent with Mitigation Measure TRANS-1, through the payment of DIF fees. Based on the reduced number of trips, a traffic signal may not be required under Alternative 1 at the intersection of Verano and Avenue 50. However, because of the lower traffic generated by Alternative 1, impacts on area intersections would be expected to be less than significant, and with the installation of a traffic signal at Hjorth and Avenue 50, would operate at LOS D or better. Alternative 1 would be required to contribute DIF fees for area traffic improvements, and would be required to improve Avenue 50 to its ultimate half-width. As a result, impacts associated with Alternative 1 to intersection operations in the area surrounding the site would be expected to be less than significant, and less than either the proposed Project or Alternative 2.

Alternative transportation under Alternative 1 would still result in the planned Cycle Track on Avenue 50, as well as sidewalks for pedestrian travel. The site would remain within ½ mile of shopping and employment opportunities at the corner of Jefferson Street and Avenue 50. The site would remain without public transit access under Alternative 1, although the lower number of units and residents would also lower the demand for public transit. Under Alternative 1, there would be no conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities.

Alternative 2 (Suburban Neighborhood)

Alternative 2 would include a General Plan Amendment which would change the designation of the site to "Suburban Neighborhood" (0-8 DU/AC), an existing land use in the General Plan and the next density level up from "Desert Estates Neighborhood." Maximum buildout potential under Alternative 2 would result in 361 residential units, or 316 more units than considered in the GPU EIR. Using the same trip generation as the proposed Project, as defined in the traffic study, Alternative 2 would result in a total of 3,408 daily trips.

The traffic engineer completed intersection analysis for Alternative 2, as provided in the following Tables. As shown in **Table 3.18-1** in the Opening Year, Alternative 2 would result in unacceptable levels of service at Avenue 50 and Verano, the access point for Alternative 2, in both the morning and evening peak hours, which can be mitigated by the restriping of east and west bound traffic lanes to accommodate traffic. This would be part of the widening required on Avenue 50 with development of any project on the site. With the widening of Avenue 50 to its ultimate cross section, impacts associated with Alternative 2 would be less than significant, insofar as all intersections would operate at an acceptable LOS.

Table 3.18-1
Opening Year (2022) with Alternative 2 Maximum Buildout

Intersection	Traffic Control[3]	Intersection Approach Lanes[1]												Peak Hour Delay-LOS[2]	
		Northbound			Southbound			Eastbound			Westbound				
		L	T	R	L	T	R	L	T	R	L	T	R	Morning	Evening
Jefferson Street (NS) at: Avenue 48 (EW)	TS	2	3	1	2	3	1	1	2	1	1	1.5	0.5	22.5-C	29.6-C
Avenue 49 (EW)	TS	1	3	1	1	2.5	0.5	0.5	0.5	1	1	0.5	0.5	18.6-B	14.6-B
Avenue 50 (EW)	TS	1	3	1	2	3	1	1	2	1	1	1	1	26.4-C	23.5-C
Verano Drive (NS) at: Avenue 50 (EW)															
- Without Improvements	CSS	0	<1>	0	0	0	0	0	2	d	0	<1>	0	53.8-F	68.3-F
- With Improvements	CSS	0	<1>	0	0	<1>	0	**1**	1.5	**0.5**	**1**	**1.5**	0.5	11.2-B	5.5-A
Madison Street (NS) at:															
Avenue 49 (EW)	AWS	1	1.5	0.5	1	1.5	0.5	0	<1>	0	0	<1>	0	11.8-B	11.2-B
Avenue 50 (EW)	TS	2	2	1	2	2	1	1	2	1	1	2	1	23.7-C	23.1-C
Hjorth Street (NS) at: Avenue 50 (EW)															
- Without Improvements	CSS	0	0	0	0	<1>	0	1	1	0	0	<1>	0	33.9-D	21.9-C
- With Improvements	**TS**	0	0	0	0	<1>	0	1	1	0	0	<1>	0	6.7-A	3.3-A
Monroe Street (NS) at: Avenue 50 (EW)	TS	1	1.5	0.5	1	1.5	0.5	1	1	1	1	1	1	19.4-B	19.0-B

In addition, an analysis of General Plan build out (2040) was undertaken for project area intersections, as shown in **Table 3.18-2**. As shown in that Table, and similar to conditions under the proposed Project and Alternative 1, an unacceptable impact occurs at Hjorth Street and Avenue 50, with or without Alternative 2, without the addition of a traffic signal. With the addition of the traffic signal, this intersection would operate at acceptable levels of service. In addition, Alternative 2 would result in unacceptable levels of service at the intersection of

Jefferson Street and Avenue 48 in the evening peak hour, without improvements. These improvements would consist of the addition of a westbound dedicated right turn lane, instead of the current shared/through lane at this intersection. With this addition, this intersection would operate at acceptable levels. As is the case with the proposed Project, the intersection of Verano and Avenue 50 would also require a traffic signal in order to operate as acceptable levels under Alternative 2. The Alternative's contribution to the signal at Hjorth, the signal at Verano and the lane improvements at Avenue 48 would be through the payment of DIF fees. The first two improvements would be addressed consistent with Mitigation Measure TRANS-1. The third, however, would require an additional mitigation measure.

Table 3.18-2
General Plan Buildout (2040) with Alternative 2 Maximum Buildout

Intersection	Traffic Control[3]	Intersection Approach Lanes[1]												Peak Hour Delay-LOS[2]	
		Northbound			Southbound			Eastbound			Westbound				
		L	T	R	L	T	R	L	T	R	L	T	R	Morning	Evening
Jefferson Street (NS) at: Avenue 48 (EW)															
- Without Improvements	TS	2	3	1	2	3	1	1	2	1	1	1.5	0.5	27.8-C	56.6-E
- With Improvements	TS	2	3	1	2	3	1	1	2	1	1	**2**	**1**	27.5-C	37.0-C
Avenue 49 (EW)	TS	1	3	1	1	2.5	0.5	0.5	0.5	1	1	0.5	0.5	27.5-C	19.9-B
Avenue 50 (EW)	TS	1	3	1	2	3	1	1	2	1	1	1	1	45.1-D	29.1-C
Verano Drive (NS) at: Avenue 50 (EW)															
- Without Improvements	CSS	0	<1>	0	0	0	0	0	2	d	0	<1>	0	99.9-F	99.9-F
- With Improvements	**TS**	0	<1>	0	0	<1>	0	**1**	1.5	**0.5**	**1**	**1.5**	0.5	7.2-A	5.3-A
Madison Street (NS) at: Avenue 49 (EW)	AWS	1	1.5	0.5	1	1.5	0.5	0	<1>	0	0	<1>	0	16.7-C	14.7-B
Avenue 50 (EW)	TS	2	2	1	2	2	1	1	2	1	1	2	1	24.4-C	23.2-C
Hjorth Street (NS) at: Avenue 50 (EW)															
- Without Improvements	CSS	0	0	0	0	<1>	0	1	1	0	0	<1>	0	99.9-F	34.2-D
- With Improvements	**TS**	0	0	0	0	<1>	0	1	1	0	0	<1>	0	9.9-A	4.0-A
Monroe Street (NS) at: Avenue 50 (EW) - #8	TS	1	1.5	0.5	1	1.5	0.5	1	1	1	1	1	1	25.2-C	20.7-C

As with both Alternative 1 and the proposed Project, development under Alternative 2 would be required to pay DIF fees for area improvements, and would build out Avenue 50 to its ultimate half width. As a result, although Alternative 2 would require improvements at an additional intersection at General Plan build out (Jefferson and Avenue 48), its impacts can be mitigated, and with improvements all project area intersections would operate at acceptable levels.

Alternative transportation under Alternative 2 would still result in the planned Cycle Track on Avenue 50, as well as sidewalks for pedestrian travel. The site would remain within ½ mile of shopping and employment opportunities at the corner of Jefferson Street and Avenue 50. The site would remain without public transit access under Alternative 1, and with Alternative 2's higher number of residents, would potentially increase demand for transit in the area. All

development under Alternative 2 would be required to comply with General Plan policies, and other programs and requirements of the City relating to alternative transportation. Impacts associated with Alternative 2 would be expected to be less than significant.

b) Conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b).

Alternative 1 (No Project/Existing General Plan)

Alternative 1 would result in the development of 45 single family homes, consistent with the General Plan's designation for the property. As described in Section 2.18, the City has not adopted a policy for the analysis of Vehicle Miles Traveled (VMT), so the County of Riverside's policy was used to determine impacts. The County's policy includes a comprehensive analysis process that begins with a screening procedure for various types of projects. In the case of single-family homes, the policy's screening criteria has established a threshold of 110 dwelling units or Project GHG emissions less than 3,000 Metric Tons of Carbon Dioxide Equivalent ($MTCO_2e$). Any project which proposes fewer than 110 single-family homes or that generates less than 3,000 $MTCO_2e$ is presumed to have a less than significant impact on vehicle miles traveled. In the case of Alternative 1, it would be a project of less than 110 units, and as described in Section 3.10, Alternative 1 would result in less than 3,000 $MTCO_2e$ in greenhouse gas emissions. Therefore, under the requirements of CEQA Guidelines 15064.3(b), Alternative 1 would have a less than significant impact on VMT.

Alternative 2 (Suburban Neighborhood)

Alternative 2 would include a General Plan Amendment which would change the designation of the site to "Suburban Neighborhood" (0-8 DU/AC), an existing land use in the General Plan and the next density level up from "Desert Estates Neighborhood." Maximum buildout potential under Alternative 2 would result in 361 residential units. Alternative 2 also would generate more than 3,000 $MTCO_2e$ in greenhouse gas emissions. Therefore, Alternative 2 could not be presumed to screen out under the County's VMT policy, or to have a less than significant impact on VMT. A full analysis of the VMT impacts of Alternative 2 was not conducted. The site does not, however, occur in a low VMT area, but Alternative 2 would also not be expected to significantly increase the local miles of travel, insofar as new homeowners would be likely to shop at the same locations as existing homeowners, and have similar work driving patterns as existing homes within the area. However, because Alternative 2 cannot be presumed to have a less than significant impact on VMT based on the screening criteria contained in the VMT policy, Alternative 2 could result in significant impacts associated with VMT.

c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).

d) Result in inadequate emergency access.

Alternative 1 (No Project/Existing General Plan)

Under Alternative 1, 45 single family homes would be constructed on internal roadways which would access Avenue 50 to enter the public roadway system. Under this alternative, as with Alternative 2 and the proposed Project, the City Engineer would review sight lines, road layout and other safety factors as part of the entitlement review required of all projects. Similarly, the Fire Department would undertake an assessment of emergency access, and assure that sufficient emergency access was provided. Since development under Alternative 1 would result in less development, larger lots and more flexibility in the design of internal roadways, impacts associated with increased hazards and emergency access would be less than significant.

Alternative 2 (Suburban Neighborhood)

Alternative 2 would result in the development of up to 361 dwelling units, likely attached units grouped in rows or clusters throughout the site. Access to this alternative would remain on Avenue 50. As with Alternative 1 and the proposed Project, the City Engineer would review sight lines, road layout and other safety factors as part of the entitlement review required of all projects. Similarly, the Fire Department would undertake an assessment of emergency access, and assure that sufficient emergency access was provided. Because of the increased units, however, the Fire Department could require, in addition to the two means of access provided by the main entry drive at a 24 foot width, a third point of access, potentially from the dirt roadway located at the site's eastern boundary. However, with the imposition of City and Fire Department standards and requirements, the impacts associated with road hazards and emergency access would be reduced to less than significant levels.

3.18.4. Mitigation Measures

As described above, Mitigation Measure TRANS-1 would reduce impacts of Alternative 1 to less than significant levels, and the signalization of Verano and Avenue 50 could not be required. Mitigation Measure TRANS-1 would also reduce impacts associated with Alternative 2, but would need to be modified to address fair share contributions to the impacts at Jefferson Street and Avenue 48. With implementation of mitigation measures, however, both Alternative 1 and 2 will result in less than significant traffic impacts.

3.18.5. Environmental Superior Alternative

Alternative 1 would result in lower traffic generation, and would likely not require signalization of Verano and Avenue 50. It would, like the proposed Project and Alternative 2, contribute to the signalization of Hjorth and Avenue 50. In terms of VMTs, Alternative 1 would be presumed to have less than significant impacts, as would the proposed Project, while Alternative 2 would have the potential to have significant impacts as it would not be considered a small project, and would generate GHG emissions above 3,000 $MTCO_2e$. Because of the need for fewer improvements, Alternative 1 is the environmentally superior alternative, although both Alternative 1 and the proposed Project would have less than significant impacts.

3.19. Tribal Cultural Resources

3.19.1. Introduction

This section provides an evaluation of potential tribal cultural resource impacts that would result from implementation of Project alternatives. The site is located on the desert floor of the Coachella Valley, which has been home to Native Americans for millennia. The potential impacts of alternatives to these resources are discussed below.

3.19.2. Existing Conditions

Scattered cultural resources have been reported throughout the valley and are most frequently associated with areas with year-round and seasonal food sources and other ethnobotanical resource areas, lithic workshops, and trails. A Cultural Resources Survey report was prepared for the proposed Project by ASM Affiliates Inc. (ASM, 2020)[29]. No cultural resources were identified within or in proximity to the Project site in the historical records search and field survey.

Consultation with local Native American tribes and the Native American Heritage Commission did not yield specific information on Native American cultural resources, including sacred lands, in the area. Three of the 21 tribes contacted during the SB 18 and AB 52 consultation responded in writing, requesting formal government to government consultation:

- Agua Caliente Band of Cahuilla Indians (ACBCI)
- Campo Band of Mission Indians (CBOMI)
- Torres Martinez

As described in Section 2.19, consultation meetings were held in August and October of 2020.

Any development occurring in the City could result in the accidental destruction or disturbance of known or as yet unidentified sacred uses/tribal cultural resources, should construction activities such as grading and excavation occur in sites of tribal significance, including sacred lands and archaeological sites, or sites containing human remains. The General Plan Conservation Element includes policies to ensure that impacts to tribal cultural resources are taken into consideration and reduced or minimized in conjunction with future development through monitoring (Policy CE-8.4) and coordination with local tribes (Policy CE-8.6). These policies would guide future development, such that significant tribal cultural resources would be avoided and, if avoidance is not possible, measures to mitigate significant impacts would be implemented in accordance with CEQA.

[29] "Cultural Resources Study for the Avenue 50 Indio Project, Indio, Riverside County, California," prepared by ASM Affiliates, Inc., March 13, 2020.

Please see Section 2.19.4 and Section 2.19.5 for a detailed description of existing cultural resources conditions.

3.19.3. Alternatives Impact Analysis

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

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

Alternative 1 (No Project/Existing General Plan)

Alternative 1 assumes the site would build out under the existing General Plan land use designation, "Desert Estates Neighborhood" (1 DU/AC), and would have a maximum buildout potential of 45 single family dwelling units. Alternative 1 would cover the same land (planning area) as the proposed Project and Alternative 2.

Alternative 1 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 are known to occur onsite. As explained in Section 2.19.6 and above, the site-specific cultural resources study determined that the Project site contains no historical resources pursuant to CEQA § 15064.5. The subject property area is not identified by the City of Indio as a potential historic district or conservation zone. No impact will occur.

Alternative 2 (Suburban Neighborhood)

Maximum buildout potential under Alternative would result in 361 residential units. Alternative 2 would cover the same land as the proposed Project and Alternative 1, but result in more residential units.

According to the General Plan Update EIR (Figure 4.5-2), the City of Indio General Plan Update Draft Historic Resources Survey identified known historic resources, potential historic districts and local conservations zones, which are clustered in the center of the City. There are no identified tribal cultural resources in the Project area or vicinity. Therefore, under Alternative 2, no impact would occur on the subject site regarding the significance of a tribal historic resource that is eligible for listing in the California Register of Historical Resources or in a local register of historical resources regardless the land use designation.

ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c)

of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

Alternative 1 (No Project/Existing General Plan)

Alternative 1 would disturb the same land as the proposed Project and Alternative 2. AB 52 and SB 18 require 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. As described above, the City of Indio distributed AB 52 and SB 18 consultation letters for the Project site to Native American tribes identified by the NAHC as having traditional lands or cultural places within City boundaries, and three tribes requested consultation. Copies of the correspondence between the City and the tribes are provided in Appendix D.

All three Tribes requested that Tribal monitors be present during earth moving activities. Mitigation Measure CUL-1 addresses this request. The Campo Band also requested that bone testing be conducted should human remains be located on the site. Although there is no evidence that human remains could occur on-site, Health and Safety Code Section 7050.5 and Public Resource Code Section 5097.9 require that if they are identified during earth moving activities, all activities must cease, the County Coroner must be called, he/she must contact the NAHC, who must contact the most likely descendant if the remains are believed to be Native American. The most likely descendant in this case would not be of the Campo Band, but of one of the existing Coachella Valley Bands, including either the Torres Martinez or the ACBCI. The Tribe consulted would determine their preferred process for internment in the Tribal tradition. This requirement of law assures that the impacts associated with the Project will remain less than significant.

Alternative 1 would be subject to same mitigation measure and requirement of law, and would result in less than significant impacts on tribal resources.

Alternative 2 (Suburban Neighborhood)

Alternative 2 would increase the development potential of the subject property from 45 to 361 dwellings on the same land area as the proposed Project and Alternative 1. Based on the AB 52 and SB 18 consultation process described above, Tribal representatives indicated the site is within the Traditional Use Area. In order to assure that impacts to unknown resources would be mitigated, a Tribal monitor is proved in Mitigation Measure CUL-1 during earth moving activities. With implementation of Mitigation Measure CUL-1, and the requirements of law relating to human remains, potential impacts to resources of significance to Native American tribes would be less than significant under Alternative 2.

3.19.4. Mitigation Measures

The mitigation measures set forth in Section 2.7.7 will be effective at reducing potential impacts of Alternatives 1 and 2 to less than significant levels.

3.19.5. Environmental Superior Alternative

All Alternatives, including the proposed Project, encompass the same planning area and propose to develop the same parcels. The difference in buildout intensities is irrelevant to tribal cultural resources. Because development under all Alternatives, including the proposed Project, will be required to comply with the same regulations and implement the same mitigation measures accordingly, all alternatives, including the proposed Project, will have essentially the same level of impact after mitigation. There is no environmentally superior alternative.

3.20. Utilities and Service Systems

3.20.1. Introduction

This section describes potential impacts on utilities and service systems that could occur as a result of implementing the Project alternatives, and analyzes the level of impact the alternatives would have on these resources. Utilities and service systems discussed in this section include water, wastewater service, storm drainage, solid waste facilities, electricity, and natural gas.

3.20.2. Existing Conditions

The site encompasses 45.17± acres of undeveloped land. The Project site is located in the urban area of the City of Indio and well served by the utilities network. Given that all alternatives occur on the same site as the proposed Project, the regulatory framework, environmental setting and existing condition analysis provided in Section 2.20 also applies to all alternatives analyzed below.

Please see Section 2.20.4 and Section 2.20.5 for a detailed description of existing utilities and service system conditions.

3.20.3. Alternatives Impact Analysis

a) ***Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects. (see Section 2.10 addressing stormwater)***

b) ***Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years.***

c) ***Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments.***

Alternative 1 (No Project/Existing General Plan)

Alternative 1 would keep the existing General Plan land use designation (Desert Estates Neighborhood, up to 1 DU/AC) for the Project site and result in a maximum buildout of 45 dwelling units. This alternative is consistent with the General Plan, and its impacts were analyzed in the GPU EIR. The GPU EIR determined that utility system impacts would be less than significant with the implementation of General Plan policies, the City's CAP and other energy efficiency measures which will be implemented through the General Plan. The analysis below quantifies Alternative 1's impacts, and addresses the localized impacts of its development.

Domestic Water Supply

As discussed in Section 3.12, Hydrology and Water Quality, the total water demand for Alternative 1 is estimated at 24.03 acre-feet per year at buildout. This represents approximately 0.13% of the IWA's 2015 baseline demand (18,208 AFY) and less than 0.06% of the projected water supply (42,910 AFY) for 2040.[30] A comparison of existing available water supplies and the water needs of Alternative 1 demonstrates that IWA has sufficient water supplies available to serve Alternative 1 in the future during normal, dry, and multiple dry years. Alternative 1's incremental effect would not be cumulatively considerable with respect to water supply and, therefore, impacts would be less than significant.

Domestic Water Infrastructure

Alternative 1 will connect to existing facilities under Avenue 50 and north of the Project boundary, and the existing 8-inch water main located north of the subject property. No new wells or additional water infrastructure would be required. Extension of water lines will have less than significant impacts on the environment as they will be limited to the subject site and immediate vicinity.

Wastewater Treatment

The site is served by CVWD for wastewater collection and treatment services. The site does not currently contain any wastewater infrastructure. Alternative 1 will require construction of on-site sewer infrastructure to connect to the existing sewer mains located under Avenue 50 along the southerly boundary.

Alternative 1 will result in 45 new single-family residences, thus generating an additional 9,000 gallons of wastewater per day (based on 200 gallons per day for a four-person residence[31]) at buildout. The WRP-7 treatment plant's capacity is 5 million gallons per day; therefore, Alternative 1's projected wastewater generation would account for approximately 0.18% of the total treatment capacity. In 2015, WRP-7 treated 3,018 acre-feet of wastewater, which is equivalent to approximately 53.9% of its capacity.[32] Therefore, WRP-7 has sufficient available capacity to serve Alternative 1 and its existing commitments. Alternative 1 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, other than parcel-level extensions. Impacts would be less than significant.

Stormwater Drainage

Alternative 1 would introduce impervious surfaces in the Project area through the construction of buildings, pedestrian pathways, and internal roadways. Alternative 1 would be required to meet the City's standard and retain the 100-year storm onsite, and would likely do so through retention areas to which internal streets would drain. A final hydrologic analysis would be

[30] Indio Water Authority 2015 Urban Water Management Plan Final Report, July 1, 2016.
[31] Coachella Valley Water District Sewer Service Rate Study Report, prepared by Stantec, May 16, 2017.
[32] 2015 Urban Water Management Plan Final Report, prepared for Coachella Valley Water District, July 1, 2016.

required to demonstrate that Alternative 1 meets the City's standards. Therefore, Alternative 1 will not result in a need to construct additional drainage facilities beyond those designed onsite, and impacts will be less than significant.

Electricity

As discussed in Section 3.8, Alternative 1 would consume approximately 392,242 kWh of electricity per year at build out. This represents 0.06% of 2010 City-wide usage, a minimal increase in local demand. Alternative 1 will require local connections to the existing IID infrastructure in the Project area. IID has existing facilities aboveground on the north side of Avenue 50 and underground on the south side. Construction of Alternative 1 will comply with applicable IID guidelines regarding installation, extension, and connection to limit impacts to electricity infrastructure and avoid service interruptions. Other than parcel-level extensions, Alternative 1 will not require the addition or expansion of electric power facilities. Impacts will be less than significant.

Natural Gas

As discussed in Section 3.8, operation of Alternative 1 would consume an estimated 13,768 therms of natural gas per year. This represents approximately 1.2% of 2010 City-wide natural gas consumption, a marginal increase in local demand. Alternative 1 will require local connections to the existing SoCalGas infrastructure in the Project area. The closest gas lines are located underground on the south side of Avenue 50. Other than parcel-level extensions, Alternative 1 will not require the addition or expansion of natural gas facilities. Prior to ground disturbance, Alternative 1 contractors would notify and coordinate with SoCalGas to identify the locations and depths of all existing gas lines and avoid disruption of gas service. Impacts will be less than significant.

Telecommunications

Alternative 1 will require parcel-level connections to the existing Frontier Communications and Spectrum infrastructure in the Project area. However, Alternative 1 will not require the addition or expansion of telecommunication facilities such that adverse environmental impacts would occur. Impacts will be less than significant.

Alternative 2 (Suburban Neighborhood)

Alternative 2 would apply an existing land use designation (Suburban Neighborhood, 0-8 du/ac) to the site, and would update the General Plan land use map accordingly. Alternative 2 would increase the development potential on the subject property from a maximum buildout of 45 dwelling units under the current General Plan designation to 361 dwelling units.

Domestic Water Supply

The water demand of an additional 316 dwelling units facilitated by the Alternative 2 General Plan Amendment is estimated at 48.85 acre-feet per year. This represents less than 0.27% of IWA's 2015 water demand (18,208 AFY) and approximately 0.11% of the projected water supply

(42,910 AFY) for 2040.[33] The total water demand for Alternative 2 (361 units) is estimated at 72.87 acre-feet per year at buildout. This represents approximately 0.4% of the IWA's 2015 baseline demand (18,208 AFY) and less than 0.17% of the projected water supply (42,910 AFY) for 2040.[34] A comparison of existing available water supplies and the water needs of Alternative 2 demonstrates that IWA has sufficient water supplies available to serve Alternative 2 in the future during normal, dry, and multiple dry years.

The GPU EIR demonstrated that IWA has adequate supplies to meet demands during normal, single dry, and multiple dry years through 2040 (GPU EIR Table 4.16-2), and that impacts related to water supply would be less than significant with implementation of General Plan policies including the implementation of water conservation measures imposed by IWA under both normal and drought conditions. Alternative 2 will be required to comply with all GPU policies and City standards pertaining to water usage and conservation. Therefore, Alternative 2 impacts associated with domestic water demand are expected to be less than significant.

Domestic Water Infrastructure

There is existing domestic water infrastructure within the subject site vicinity. Future development on the site can be expected to connect to the existing water lines and would not necessitate the construction of new wells or additional water infrastructure.

As stated in the GPU EIR, buildout of the GPU would have a less than significant impact on water facilities with adherence to General Plan policies and City standards pertaining to water infrastructure. Future development under the Alternative 2 GPA would still be subject to General Plan policies and City development standards. Potential Alternative 2 impacts would be consistent with those identified in the GPU EIR and less than significant.

Wastewater Treatment

The Project site is served by CVWD for wastewater collection and treatment services. The Project site does not currently contain any wastewater infrastructure. Future development under Alternative 2 will require construction of on-site sewer infrastructure to connect to the existing sewer mains located under Avenue 50 along the southerly site boundary.

Compared to buildout under the current General Plan designation, buildout under the Alternative 2 GPA will allow an additional 316 dwelling units and generate an additional 63,200 gallons of wastewater per day (based on 200 gallons per day for a four-person residence[35]). The WRP-7 treatment capacity is 5 million gallons per day; therefore, additional wastewater generation at buildout of the GPA would account for an increase of less than 1.3% of the treatment capacity, when compared to existing General Plan designation build out.

[33] Indio Water Authority 2015 Urban Water Management Plan Final Report, July 1, 2016.
[34] Indio Water Authority 2015 Urban Water Management Plan Final Report, July 1, 2016.
[35] Coachella Valley Water District Sewer Service Rate Study Report, prepared by Stantec, May 16, 2017.

The total units allowed under Alternative 2 will result in 361 new single-family residences, generating an additional 72,200 gallons of wastewater per day at buildout.

The WRP-7 treatment capacity is 5 million gallons per day; therefore, Alternative 2's projected wastewater generation would account for approximately 1.4% of the treatment capacity. In 2015, WRP-7 treated 3,018 acre-feet of wastewater, which is equivalent to approximately 53.9% of its capacity.[36] Therefore, WRP-7 has adequate capacity available to serve Alternative 2 and its existing commitments.

The GPU EIR (p. 4.16-18) determined that local wastewater facilities would be adequate to serve the community at General Plan buildout, and the growth accommodated by the General Plan would not exceed the requirements of the Regional Water Quality Control Board. Alternative 2 wastewater discharges will be typical of residential uses and would not exceed wastewater treatment requirements of the CVWD or RWQCB. Future wastewater generation on the site under Alternative 2 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.

Drainage System

Alternative 2 would increase the residential density on the site, and would increase the amount of impervious surfaces and runoff quantities. A hydrology study would be required for Alternative 2, to demonstrate that the site's design could meet City standards. Because of the intensity of development proposed under Alternative 2, it would be likely that on-site retention would be accomplished with a combination of surface retention basins and underground dry wells, which would likely be located under parking areas or other common area facilities. As with all other projects in the City, the hydrology study would be required to demonstrate, to the satisfaction of the City Engineer, that the Alternative would meet City standards. Although the drainage system would likely be more complex than that required for either the proposed Project or Alternative 1, impacts would remain less than significant, because of the City's standards and requirements.

The GPU EIR concluded that future development projects would be required to comply with the regulatory requirements of the RWQCB, Indio Municipal Code, and CEQA, thereby effectively controlling storm water runoff. Impacts of General Plan buildout on storm water drainage systems would be less than significant. Increased development facilitated by Alternative 2 would result in marginal runoff increases but they would be adequately controlled through implementation of the same policies and regulatory requirements. Therefore, impacts associated with storm water facilities as a result of Alternative 2 would be consistent with those identified in the GPU EIR and would be less than significant.

Electricity

Based on the CalEEMod output for Alternative 2 (Appendix B) Alternative 2 would result in an annual electricity consumption of 1,782,888 kWh for the additional 316 units over those allowed

[36] 2015 Urban Water Management Plan Final Report, prepared for Coachella Valley Water District, July 1, 2016.

under the current General Plan designation, and a total of 2,036,780 kWh of electricity per year for all 361 units. This represents approximately 0.3% of 2010 City-wide usage, a marginal increase in local demand.

Future development on the site would be subject to General Plan policies and other applicable regulations to ensure efficient use of electricity. IID has existing facilities aboveground on the north side of Avenue 50 and underground on the south side. Future development under Alternative 2 will require parcel-level connections from the Project site to these existing facilities. Development will comply with applicable IID guidelines regarding installation, extensions, and connections to limit impacts to electricity infrastructure and avoid service interruptions. Future buildout will not necessitate the addition or expansion of electric power facilities. Impacts will be less than significant.

Natural Gas

Based on the CalEEMod output for Alternative 2 (Appendix B) the 316 additional units added by the Alternative 2 GPA would result in an additional annual consumption of 71,616 therms. This represents approximately 6.4% of 2010 City-wide therm usage. Alternative 2's 361 units would consume an estimated 81,815 therms natural gas per year, or approximately 7% of 2010 City-wide natural gas consumption. Alternative 2 will require local connections to the existing SoCalGas infrastructure in the Project area. The closest gas lines are located underground on the south side of Avenue 50. Other than parcel-level extensions, Alternative 2 will not require the addition or expansion of natural gas facilities. Alternative 2 will not necessitate the addition or expansion of natural gas facilities. Impacts will be less than significant.

Telecommunications

Alternative 2 will require parcel-level connections to the existing Frontier Communications and Spectrum infrastructure in the Project area. However, Alternative 2 will not require the addition or expansion of telecommunication facilities such that adverse environmental impacts would occur. Impacts will be less than significant.

d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals.

e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste.

Alternative 1 (No Project/Existing General Plan)

Construction Impacts

Construction of the Alternative 1 would generate the same types of solid waste described in Section 2.20.6 in association with the Project buildout. Wastes are likely to include sediments, trash and debris, oil and grease, fuels, lubricants, asphalt and concrete waste, and other

materials. All debris would be disposed of in accordance with applicable standards. Non-hazardous materials that cannot be reused or recycled would be accepted for disposal at regional landfills. Hazardous materials would be recycled, treated, and/or disposed of in accordance with federal, State, and local laws (See Section 2.11, Hazards and Hazardous Materials). Waste generation will be short-term, and local and/or regional landfills would have sufficient permitted capacity to accommodate Alternative 1's construction disposal needs. Impacts will be less than significant.

Operational Impacts

Alternative 1 will generate 158.69 tons of solid waste per year as shown below.

Table 3.20-1
Estimated Solid Waste Disposal at Alternative 1 Buildout

Land Use	Per Resident Disposal Rate[1]	Alternative 1 Residents[2]	Solid Waste Disposal (pounds per day)	Solid Waste Disposal (tons per year)
Residential	5.1 pounds/household /day	149	759.9	138.68
			TOTAL (with 50% diversion)	69.34

[1] Jurisdiction Diversion/Disposal Rate Summary by CalRecycle, 2019 Indio disposal rate (pounds per day per resident), https://www2.calrecycle.ca.gov/LGCentral/DiversionProgram/Jurisdiction DiversionPost2006, accessed February 2021.
[2] See Section 3.15.3 of this DEIR.

At buildout, Alternative 1 will contribute less than 0.002% of the County's remaining capacity.[37] Commingled recyclable materials (e.g., paper, plastic, glass, cardboard, aluminum) will be transported to Burrtec's material recovery facilities for recycling and reuse. Burrtec is responsible for maintaining standards that assure that all waste is handled in a manner that meets local, state and federal standards. Adherence to these requirements and General Plan policies will assure that impacts associated with solid waste disposal are less than significant.

Alternative 2 (Suburban Neighborhood)

Alternative 2 General Plan Amendment

Construction Impacts

Construction of future development under the current General Plan (Desert Estates Neighborhood) or the Alternative 2 GPA (Suburban Neighborhood) would generate similar types of solid waste in the form of sediments, trash and debris, oil and grease, fuels, lubricants, asphalt and concrete waste, and other materials. Maximum buildout of the Alternative 2 GPA would result in 316 additional dwelling units and a proportional increase in construction waste. All debris would be placed in appropriate onsite containers and disposed of in accordance with applicable standards. Non-hazardous construction materials that cannot be reused or recycled

[37] Assumes that 1 CY of residential solid waste is equivalent to 95 lbs. "Volume to Weight Conversion Factors," US EPA Office of Resource Conversion and Recovery. April 2016.

would be accepted for disposal at regional landfills. Any hazardous materials (e.g. chemicals, oils, fuels, lubricants, paints, and solvents) would be recycled, treated, and/or disposed of in accordance with federal, State, and local laws (See Section 2.11, Hazards and Hazardous Materials). Construction-related solid waste generation will be short-term, and local and/or regional landfills would have sufficient permitted capacity to accommodate construction-related solid waste disposal needs on the Project site. Impacts will be less than significant.

Operational Impacts

As discussed above, Burrtec Waste and Recycling Services (Burrtec) provides solid waste services to the City of Indio. Solid waste is recycled, reused, or transformed at a waste-to-energy facility[38], or disposed of at one of the county's landfills. Commingled recyclable materials (e.g., paper, plastic, glass, cardboard, aluminum) will be transported to Burrtec's material recovery facilities for recycling and reuse. Burrtec is responsible for maintaining standards that assure that all waste is handled in a manner that meets local, state and federal standards.

Alternative 2 will generate 556.12 tons of solid waste per year as shown below.

Table 3.20-2
Estimated Solid Waste Disposal at Alternative 2 Buildout

Land Use	Per Resident Disposal Rate[1]	Alternative 2 Residents[2]	Solid Waste Disposal (pounds per day)	Solid Waste Disposal (tons per year)
Residential	5.1 pounds/household /day	1,195	6,094.5	1,112.25
			TOTAL (with 50% diversion)	556.12

[1] Jurisdiction Diversion/Disposal Rate Summary by CalRecycle, 2019 Indio disposal rate (pounds per day per resident), https://www2.calrecycle.ca.gov/LGCentral/DiversionProgram/Jurisdiction DiversionPost2006, accessed February 2021.
[2] See Section 3.15.3 of this DEIR.

At buildout, Alternative 2 will contribute approximately 0.01% of the County's remaining capacity.[39] Commingled recyclable materials (e.g., paper, plastic, glass, cardboard, aluminum) will be transported to Burrtec's material recovery facilities for recycling and reuse. Burrtec is responsible for maintaining standards that assure that all waste is handled in a manner that meets local, state and federal standards. Adherence to these requirements and General Plan policies will assure that impacts associated with solid waste disposal are less than significant.

3.20.4. Mitigation Measures

Impacts would be less than significant, and no mitigation measures would be required.

[38] Riverside County Nondisposal Facility Element by Riverside County Department of Waste Resources (2015), https://www.rcwaste.org/Portals/0/Files/Planning/CIWMP/NDFE.PDF, accessed February 2021.
[39] Assumes that 1 CY of residential solid waste is equivalent to 95 lbs. "Volume to Weight Conversion Factors," US EPA Office of Resource Conversion and Recovery. April 2016.

3.20.5. Environmental Superior Alternative

With regard to impacts on utilities and services systems, Alternative 1 (No Project/Existing General Plan) is superior to the other alternatives because it would result in the least number of dwelling units, and thus the lowest demand for utilities and services. Between the proposed Project and Alternative 2), the less intense proposed Project would result in the lower level of impacts because it would generate a lower number of units and a lower demand for utilities and services.

3.21. Conclusion and Overall Superior Alternative

Each sub-section of this alternatives analysis has considered the potential impacts of each alternative, and compared them on a categorical basis. The following tables provide summaries of these findings, and results in a conclusion regarding the overall environmentally superior alternative.

Table 3.21-1 shows the level of impact associated with each alternative and the proposed Project. As shown in the Table, the level of impact is generally less than significant, or can be mitigated, for all categories other than traffic impacts under Alternative 2. In that case, the alternative does not readily demonstrate compliance with VMT policies, and has the potential to have significant and unavoidable impacts in this regard.

Table 3.21-1
Comparison of Impacts – All Alternatives

	Level of Impact		
Environmental Issue	**Proposed Project**	**Alternative 1**	**Alternative 2**
Aesthetics	LS	LS	LS
Air Quality	LS	LS	LS
Biological Resources	LSM	LSM	LSM
Cultural & Tribal Resources	LSM	LSM	LSM
Energy	LS	LS	LS
Geology and Soils	LSM	LSM	LSM
Greenhouse Gas Emissions	LS	LS	LS
Hazards and Hazardous Materials	LS	LS	LS
Hydrology and Water Quality	LS	LS	LS
Land Use and Planning	LS	LS	LS
Noise	LSM	LSM	LSM
Population and Housing	LS	LS	LS
Public Services	LS	LS	LS
Transportation and Traffic	LSM	LSM	SU
Utilities and Service Systems	LS	LS	LS

LS = Less than Significant
LSM = Less than Significant with Mitigation
SU = Significant and Unavoidable

Discussion of Project Objectives and Alternatives

The purpose of the objectives is to assist the City in developing a reasonable range of project alternatives to evaluate in this EIR. These objectives are intended to explain the purpose of the Project, and to aid the decision-makers in determining the relative benefits and drawbacks

associated with each alternative. The City has identified the following list of objectives for the Project.

- Provide a bridge and buffer between the rural atmosphere of the Desert Estates and more urban Suburban Neighborhoods.
- Provide a range of residential densities that allow a broad range of housing for all segments of Indio's population.
- Provide diverse products of modern, energy efficient single-family homes in a planned community.
- Provide neighborhood parks, community gathering spaces, passive parks and/or dog parks within the neighborhood, consistent with the General Plan's vision for a more connected community.
- Expand housing inventory for City residents.

Table 3.21-2 below summarizes whether the proposed Project or the Project Alternatives meet project objectives.

Table 3.21-2
Comparison of Alternatives to Project Objectives

Proposed Objectives	Proposed Project	Alternative 1	Alternative 2
Provide a bridge and buffer between the rural atmosphere of the Desert Estates and more urban Suburban Neighborhoods.	Yes	No	No
Provide a range of residential densities that allow a broad range of housing for all segments of Indio's population.	Yes	No	No
Provide diverse products of modern, energy efficient single-family homes in a planned community.	Yes	No	Yes
Provide neighborhood parks, passive parks and/or dog parks within the neighborhood, consistent with the General Plan's vision for a more connected community.	Yes	No	Yes
Expand housing inventory for City residents.	Yes	Yes	Yes

As shown in Table 3.21-2, Alternative 1 meets the least number of Project objectives, because it would result in a single, large lot product type with limited if any community open space, and would not accommodate a broad range of residents' housing needs. Alternative 2 would meet some of the Project objectives, but would not result in a mid-density bridge between the more

intense Suburban Neighborhood and urban development to the west, and the less intense Desert Estates and more rural development to the east. On the basis of the Project objectives, the Proposed Project is the preferred alternative, followed by Alternative 2, and Alternative 1 is the least desirable alternative.

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4. UNAVOIDABLE SIGNIFICANT IMPACTS

As described in Section 2 of this EIR, neither the General Plan Amendment nor the proposed Project will have significant impacts on the environment. The GPA and the Project do not, in and of themselves, exceed any threshold analyzed in this EIR. The Project and the GPA, when considered with the build out of the General Plan, would have the potential to cumulatively impact the resources detailed below. These findings are consistent with the GPU EIR.

Air Quality

The GPU EIR determined that sensitive receptors could be exposed to substantial criteria pollutants, to violations of air quality standards and to a substantial increase in criteria pollutants as a result of General Plan build out. As described in Section 2.5, neither the General Plan Amendment nor the proposed Project will exceed SCAQMD thresholds under any of these categories.

As to air quality standards, the SCAQMD guidance states that if an individual development project generates less than significant construction or operational emissions, then the development project would not generate a cumulatively considerable increase in emissions for those pollutants for which the Basin is in nonattainment.

The GPU EIR determined that future development facilitated by the General Plan would result in a considerable net increase in ozone, CO, PM10 and PM2.5, resulting in a significant impact to regional attainment of the NAAQS and CAAQS for the Coachella Valley. Compared to the General Plan, both the maximum buildout of the proposed GPA and VENTANA Specific Plan would result in increased levels of criteria pollutants, albeit marginally, and would therefore contribute to the

cumulatively considerable impacts. Adverse effects would be reduced through adherence to federal, state, and regional regulations, compliance with SCAQMD thresholds and GPU policies, and project-level CEQA review by the City and other relevant agencies, consistent with the findings of the GPU EIR.

Air quality impacts associated with the GPA and the proposed Project will not be significant and will not exceed established thresholds. Residents of the proposed Project will be exposed to the same pollutant concentration as the rest of the build out population of the City, and the Project will not substantially increase these concentrations. Therefore, although the Project will contribute marginally to the cumulative air quality impacts associated with build out of the General Plan, its impact will not be significant, and it will not substantially increase cumulative impacts.

Agricultural Resources

The GPU EIR found that the conversion of agricultural land to non-agricultural use would result in a cumulatively significant impact to this resource. As described in Section 2.4, the land encompassed in the GPA and the proposed Project was considered in the GPU EIR, since it was designated for non-agricultural residential development. The implementation of the GPA and the proposed Project, therefore will not increase the cumulative impacts associated with the loss of agricultural land, but has rather already been analyzed in the GPU EIR, since the same level of loss will occur under Project conditions as would occur under General Plan build out. Therefore, the implementation of the GPA and the proposed Project would not change the level of cumulative impact associated with General Plan build out, and cumulative impacts would remain as described in the GPU EIR.

Noise

The GPU EIR determined that the cumulative noise impacts generated by traffic noise in the City would be cumulatively considerable until such time as all roads in the General Plan boundary were paved with noise-absorbing materials. The implementation of the General Plan Amendment and the proposed Project will not result, in and of itself, in any significant noise impact. However, as with the rest of the City, the Project cannot control when the City will complete installation of noise-absorbing materials on all City roads. The Project will be required to improve Avenue 50 to its ultimate half-width, and as part of that widening will implement the City's requirements regarding appropriate paving. However, since the Project will marginally increase noise levels on City roads that are not paved with noise-absorbing materials, it cannot reduce these city-wide impacts. Therefore, the GPU EIR's determination that noise impacts will be significant until such time as noise-reducing paving is installed city-wide remains significant and unavoidable.

In addition, the GPU EIR found that noise levels at three locations: Madison Street from Indio Boulevard to Fred Waring Drive, Dillon Road from Fargo Canyon Road to Avenue 44, and Avenue 44 from Harrison Street to Dillon Road would experience significant noise increases. Neither the GPA nor the Project will contribute to noise levels on these roadway segments, because they are

far-removed from the Project site. As a result, the implementation of the GPA and the proposed Project will not impact these noise levels, and cumulative noise impacts associated with General Plan build out are unaffected by the proposed Project.

Conclusion

As noted in the GPU EIR, the benefits of General Plan build out were determined to outweigh the impacts to these resources, and the City adopted Findings and a Statement of Overriding Considerations when it certified the GPU EIR in 2019. Conditions have not changed, and the proposed Project's contribution to cumulative impacts associated with air quality, agricultural resources and noise will not increase the cumulative impacts identified in the GPU EIR substantially. Therefore, the Findings contained in the City's certification of the General Plan Environmental Impact Report apply to the General Plan Amendment and the proposed Project, and no further action is necessary.

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5. IRREVERSIBLE COMMITMENT OF RESOURCES

As required by CEQA Section 15126.2(c), this section of the EIR addresses the potentially significant irreversible environmental changes to, or loss of non-renewable resources that could occur from implementation of the General Plan Amendment and the proposed Project. In general, non-renewable resources include fossil-based energy resources, but may also include the permanent loss of biological, mineral and other natural resources. The use of non-renewable resources during short-term construction and long-term operation of the proposed Project may be irreversible and irretrievable.

As described in the GPU EIR, the development of lands currently identified as important farmlands will represent a significant impact to agricultural resources. The land on which the GPA and proposed Project are proposed are included in the GPU EIR analysis, because these lands are proposed for residential development under the General Plan's current land use designation. As described in Section 2.4 and Section 4, the cumulative loss of farmland with the General Plan's boundary will be significant and unavoidable. The GPA and the proposed Project do not add to the level of cumulative impact, but are part of that considered in the GPU EIR.

The development of the Project will result in the irretrievable and irreversible commitment of non-renewable natural resources, including energy resources such as petroleum and natural gas, water resources, and mineral resources used for construction materials, such as concrete and steel.

Construction of the proposed Project will result in the permanent loss of fossil fuels through the consumption of coal, petroleum or natural gas for the manufacture of steel, Portland Cement

and concrete, and to fuel construction and maintenance vehicles. As detailed in Section 2.8, the construction of proposed Project could result in electricity demand associated with construction activities. The use of diesel fuel and gasoline for operation of equipment and for worker vehicle trips will be the primary source of energy during construction. Because construction equipment and workers are expected to come from the local area, it is expected that the use of fuel is already occurring for other projects and worker trips in the Coachella Valley, and this use will therefore not be excessive or wasteful.

As described in Section 2.8, the GPA would result in an additional 793,199 kWh for the additional 91 units it would allow, over that considered in the GPU EIR. On-going operation of the proposed Project will generate demand for approximately 897,797 kWh of electricity per year. Future development of the GPA and the proposed Project would be required to meet the current CalGreen building code, including the objectives set in the AB 32 Scoping Plan (CARB 2017), which would seek to make all newly constructed residential homes zero net energy (ZNE) consumers by 2020[1]. Electricity demand generated by the proposed Project would increase electricity 0.14% of 2010 City-wide kWh usage.

Natural gas will be used during operation of the GPA and the proposed Project. It is estimated that the GPA would consume an additional 27,843 therms for the additional 91 units allowed and represent less than 2.5% of 2010 City-wide therm usage. Operation of the Project would consume approximately 31,522 therms of natural gas per year, which is equivalent to 2.8% of 2010 City-wide therm usage. As is the case with electricity, adherence to existing and future building codes will assure the efficient use of natural gas, and continued improvements in technology, particularly related to appliances and HVAC equipment, will reduce long term demand.

During operation, the Project would result in the consumption of petroleum-based fuels related to vehicular travel to and from the Project site. During operation, the Project is projected to generate 2,168,407 vehicle miles traveled to and from the Project site[2], resulting in the consumption of petroleum-based fuels. This represents a 0.8% increase from the 2010 city-wide VMT.

Although the Project will result in a direct increase in VMTs, the Project will not interfere with increased fuel efficiency standards and will not result in wasteful, inefficient, or unnecessary consumption of transportation energy resources during operation.

The construction of the GPA and the proposed Project will change the physical environment of the Project site. As discussed in Section 2.6, the proposed Project will not result in significant

[1] New Residential Zero Net Energy Action Plan 2015-2020 – Executive Summary by California Public Utilities Commission Energy Division and California Energy Commission Efficiency Division.

[2] CalEEMod outputs (see Appendix B).

loss of biological resources. The site is surrounded by development, and has previously been used for agriculture. No special status species were identified on the Project site. The Project will be required to pay mitigation fees to assure the off-site conservation of habitat lands for sensitive species covered by the Coachella Valley Multiple Species Habitat Conservation Plan. Therefore, although the proposed Project will result in the permanent loss of approximately 45 acres of vacant land, that loss will not be significant.

As discussed in Sections 2.12 and 2.20, construction of the GPA and the proposed Project will generate demand for water resources. The water demand of the 91 additional dwelling units facilitated by the proposed General Plan Amendment is estimated at 14.07 acre-feet per year, while the total water demand for the proposed Project is estimated at 32.99 acre-feet per year at buildout. Given the size and scope of the Project, the net annual demand for domestic water will be low, and impacts to the region's water supply will be less than significant.

In summary, although the proposed Project will result in the irreversible loss of finite resources, the loss will not be significant, and is consistent with or less than that expected for a project of similar scope consistent with the City's General Plan. The implementation of General Plan policies, the requirements of law and the City's standard requirements will all serve to reduce impacts to these resources to the greatest extent possible.

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6. GROWTH INDUCING IMPACTS

Section 15126.2 of the CEQA Guidelines requires that an EIR consider and analyze a project's potential to induce growth. Growth inducement can be directly generated by a project, such as the extension of a roadway into a previously undeveloped area, or may indirectly impact growth and cause changes in the environment that could lead to growth. This section is based on the project description provided in Section 1 of this EIR, and the analysis of the various impact areas conducted in Section 2.

Development under the proposed GPA would result in the potential for 91 housing units more than that currently possible under the Desert Estates Neighborhood land use designation. Build out of the Project would result in a total of 103 single family homes, or 58 more homes than currently allowed under the current General Plan designation. These units would generate an additional population of 301 persons for the GPA, and 192 persons for the proposed Project, over that anticipated in the General Plan. Given the General Plan area's build out population of 119,951, the growth represented in these units is insignificant. Furthermore, as described in the GPU EIR, the growth accommodated by the General Plan falls short of SCAG's 2040 projections for the City, and the Project's increased units and associated population will not cause the City to exceed these growth projections (please see Section 2.15).

As described in Section 2 of this EIR, the Project site is currently served by all utilities, and will not extend new roads or other infrastructure. The site is surrounded by development on all sides, and represents an infill site in the City's southern area. Anticipated growth in this area will be consistent with that proposed by the Project, insofar as this area of the City is planned

for residential development. Residents of the proposed Project would be anticipated to be a combination of existing residents of the City and surrounding cities, as well as new residents moving to Indio as part of its anticipated growth.

In conclusion, as described throughout this document, the Project will not result in growth inducing impacts that could cumulatively impact the environment beyond that already described and considered in the GPU EIR. No new infrastructure, services or utilities, will be required for the proposed Project, and its impacts on the local population will be less than significant.

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7. ORGANIZATIONS, PERSONS AND DOCUMENTS CONSULTED

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D. Air Quality Consultant

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E. Biological Consultant

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Riverside, CA 92507

F. Cultural Consultant

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G. Geotechnical Engineering Consultant

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H. Hydrology Consultant

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Palm Desert, CA 92211

I. Noise Consultant

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J. Traffic Consultant

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Orange, CA 92868

K. Utilities, Other Agencies & Service Providers

Burrtec Waste & Recycling Services
Coachella Valley Water District
Frontier Communications Corporation
Southern California Edison
Spectrum
Southern California Gas Company

California Office of Planning and Research
Coachella Valley Association of Governments
Desert Sands Unified School District
Imperial Irrigation District
Indio Water Authority Regional Water Quality Control Board
Riverside County Airport Land Use Commission
Riverside County Flood Control & Water Conservation District
Riverside County Transportation Department
South Coast Air Quality Management District
Southern California Association of Governments

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