City of Indio
Community Development Department
100 Civic Center Mall
Indio CA 92202
(760) 391-4120
(760) 391-4027

Environmental Initial Study

Project Title: Self-Storage Indio

Case No: Environmental Assessment
General Plan Amendment
Specific Plan
Tentative Tract Map

Lead Agency Name and Address: City of Indio
Community Development Department
100 Civic Center Mall
P.O. Drawer 1788
Indio, CA 92202

Property Owner/ Developer: Commercial Lighting Industries, Inc.
c/o Frank Halcovich
81161 Indio Boulevard
Indio, CA 92201

Applicant: Commercial Lighting Industries, Inc.
c/o Frank Halcovich
81161 Indio Boulevard
Indio, CA 92201

Engineer: MSA Consulting, Inc.
34200 Bob Hope Drive, Rancho Mirage, CA 92270 (760) 320-9811

Contact Person and Phone Number: Kevin Snyder, AICP, Community Development Director
Community Development Department
(760) 391-4016

Project Location: 81161 Indio Boulevard, Indio
APN: 610-030-001

Existing Zoning: Existing – Industrial Park District (IP)
Proposed – Industrial Park District (IP)

General Plan Designations: Existing – Workplace Employment District
Proposed – Workplace Employment District

Project Description:

The proposed project is located at 81161 Indio Boulevard and occupies approximately 5.14 acres south of Indio Boulevard and 400 feet east of Madison Street. The project is characterized by developed industrial uses in the northwestern portion of the site, and disturbed vacant land in the southeastern portion of the site. The property can be identified as Assessor's Parcel Numbers (APN) 610-030-001 within Section 15, Township 5 South, Range 7 East, San Bernardino Base and Meridian.

The project site is surrounded by industrial uses and vacant land. Specifically, Indio Boulevard is located to the north; developed industrial properties are located to the west; property to the east includes various commercial and automotive and business operations. One of the neighboring uses includes a residential structure with frontage on Indio Boulevard; and vacant land is located to the south. A single family residential community is located approximately 200 feet south of the project boundary, separated by vacant land.

The approximately 5.14-acre project site has been disturbed from development or construction activities. Approximately 3.3 acres of the property are developed with one primary building, accessory metal-frame structures, and associated parking lot and paved areas being utilized for administration, design, and distribution operations by a commercial lighting business. The primary building includes a reception/front desk, lighting showroom, offices, restrooms, and office-related storage areas. Approximately half of the primary building distinctively serves as a warehousing area with commercial pallet racks for boxed commercial lighting products. The tree metal-framed accessory structures also provide storage for various materials associated with the commercial lighting business. The primary driveway access and parking lot are found at the north-end of the property. The remaining southeast portion (approximately 1.84 acres) remains in a vacant and unpaved condition. The vacant yard is characterized by deposits of various abandoned materials from unknown sources, including stockpiles of soil, green waste, and demolished material, as well as vehicle tires, miscellaneous debris, and two parked vehicles in an apparent inoperable condition.

The project proposes to subdivide the 5.14-acre site into two lots. Approximately 3.58 acres of the 5.14-acre project site will be utilized for the proposed project while 1.56 acres will remain as is and is considered Lot 1 and "not a part" of the proposed storage project on Lot 2.

The project proposes the development of five storage buildings and an office building on the project site. Primary access will be located at Indio Boulevard. The proposed office building will be 1,000 square feet, and the proposed storage buildings will be 91,696 square feet, for a total of 92,696 square feet of proposed structures. The project also proposes access roads, hardscape, parking areas, and landscaped areas.

Entitlements for the property include Tentative Tract Map 38335 to subdivide the property into 2 lots, and Design Review for the architecture. As previously stated, Lot 1 will consist of the northwestern-most portion of the site. The existing building in the northwest portion will remain. No revisions to this building are proposed. Lot 2 will include the remaining property area, which includes an additional structure and disturbed land. The additional structure is currently located south of the northern building and will be demolished, and a new building will be developed in its place.

General Plan Land Use and Zoning

The General Plan land use designation for the property is Industrial Park and the zoning is Industrial Park (IP).

Other public agencies whose approval is required:

- Regional Water Quality Control Board (RWQCB)
- Indio Water Authority
- State Water Resources Control Board (SWRCB)



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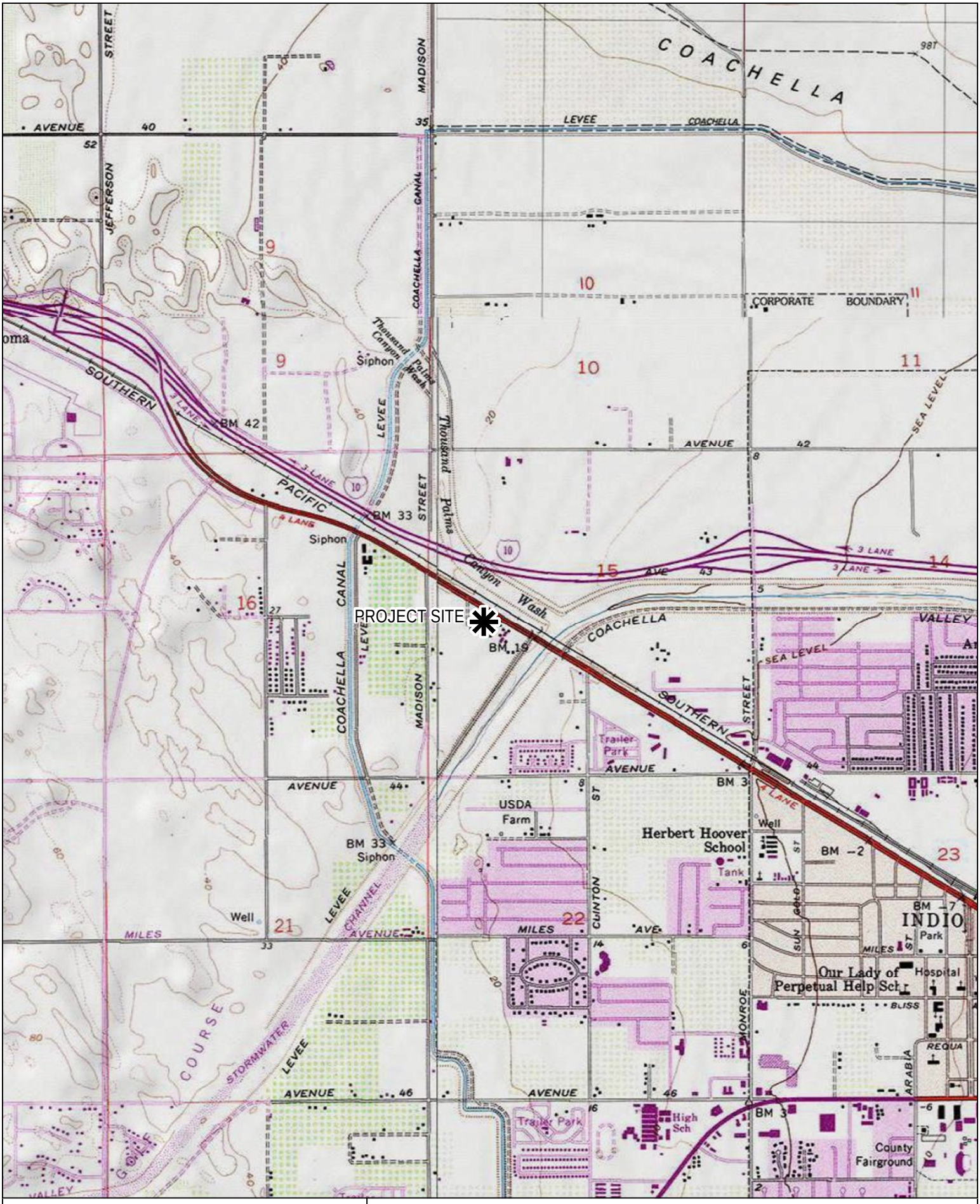
> PLANNING > CIVIL ENGINEERING > LAND SURVEYING

0 NORTH 5,000 FT

VICINITY MAP
INDIO STORAGE
EXHIBIT 1



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0 NORTH 2,000 FT

USGS TOPOGRAPHIC MAP
INDIO STORAGE
EXHIBIT 2



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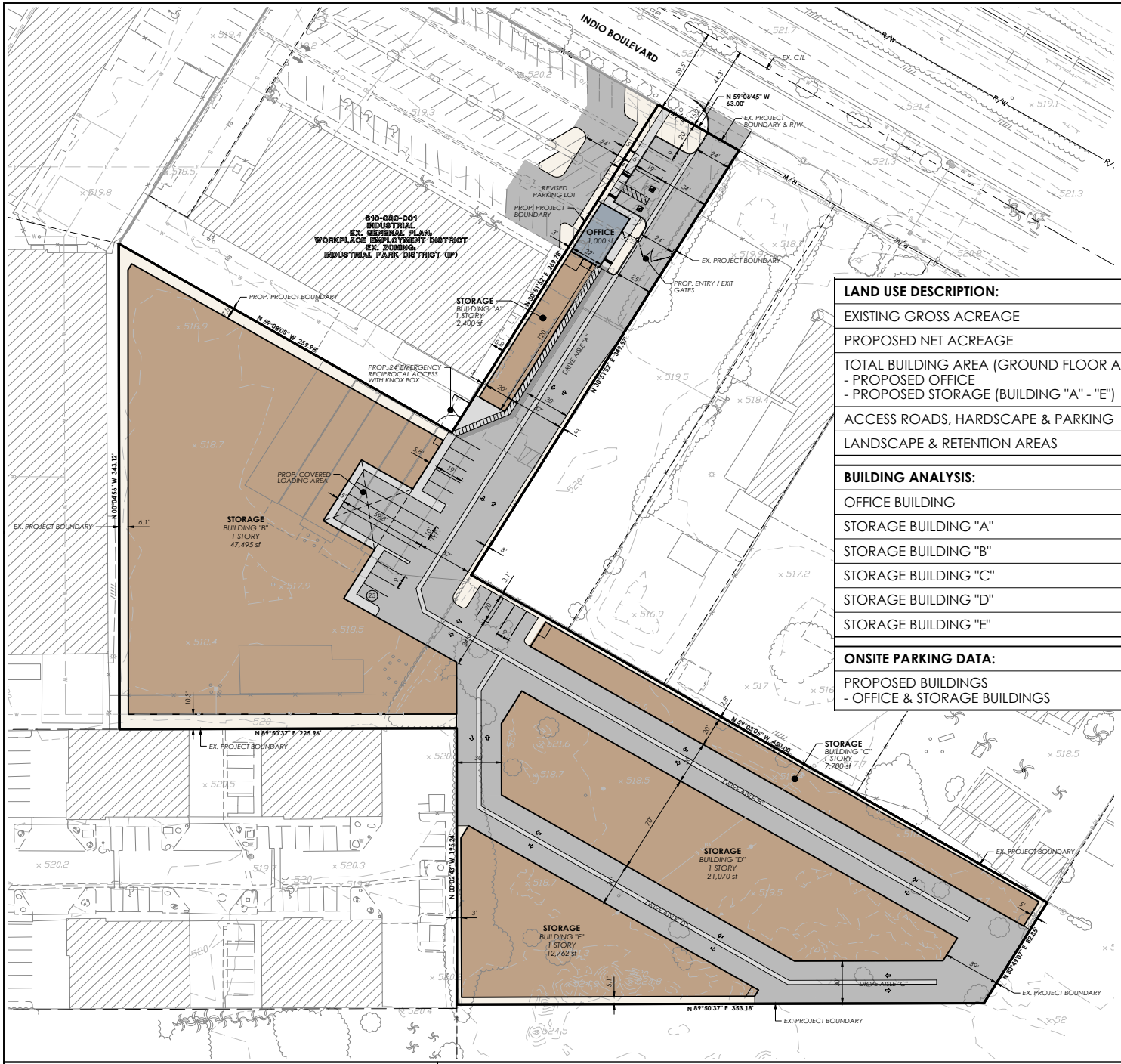
> PLANNING > CIVIL ENGINEERING > LAND SURVEYING

0 NORTH 200 FT

AERIAL PHOTOGRAPH
INDIO STORAGE
EXHIBIT 3



LAND USE DESCRIPTION:	SF	ACREAGE	PERCENTAGE
EXISTING GROSS ACREAGE	223,805 SF	5.14 AC.	-
PROPOSED NET ACREAGE	155,805 SF	3.58 AC.	100%
TOTAL BUILDING AREA (GROUND FLOOR AREA) - PROPOSED OFFICE - PROPOSED STORAGE (BUILDING "A" - "E")	92,427 SF 1,000 SF 91,427 SF	2.12 AC. 0.02 AC. 2.10 AC.	59% - -
ACCESS ROADS, HARDSCAPE & PARKING	51,922 SF	1.20 AC.	34%
LANDSCAPE & RETENTION AREAS	11,456 SF	0.26 AC.	7%

BUILDING ANALYSIS:	SF	STORY
OFFICE BUILDING	1,000 SF	1 STORY
STORAGE BUILDING "A"	2,400 SF	-
STORAGE BUILDING "B"	47,495 SF	-
STORAGE BUILDING "C"	7,700 SF	-
STORAGE BUILDING "D"	21,070 SF	-
STORAGE BUILDING "E"	12,762 SF	-

ONSITE PARKING DATA:	SF	PARKING PROVIDED
PROPOSED BUILDINGS - OFFICE & STORAGE BUILDINGS	92,427 SF -	23 STALLS -

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NORTH
N.T.S.

SITE PLAN
INDIO STORAGE
EXHIBIT 4

EVALUATION OF ENVIRONMENTAL IMPACTS:

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

☐	Aesthetics	☐	Agriculture and Forestry Resources	☐	Air Quality
☒	Biological Resources	☒	Cultural Resources	☐	Energy
☒	Geology /Soils	☐	Greenhouse Gas Emissions	☐	Hazards & Hazardous Materials
☐	Hydrology / Water Quality	☐	Land Use / Planning	☐	Mineral Resources
☐	Noise	☐	Population / Housing	☐	Public Services
☐	Recreation	☐	Transportation/Traffic	☐	Tribal Cultural Resources
☐	Utilities / Service Systems	☐	Wildfire	☐	Mandatory Findings of Significance

DETERMINATION: On the basis of this initial evaluation: (To be completed by the Lead Agency)

☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☐ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☐ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Signature:
Kevin Synder, AICP /Director of Community Development
City of Indio

Date:

Environmental Checklist and Discussion:
The following checklist evaluates the proposed project's potential adverse impacts. For those environmental topics for which a potential adverse impact may exist, a discussion of the existing site environment related to the topic is presented followed by an analysis of the project's potential adverse impacts. When the project does not have any potential for adverse impacts for an environmental topic, the reasons why there are no potential adverse impacts are described.

1. AESTHETICS -- Would the project**:**	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
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 or 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?	☐	☐	☒	☐

Sources: Indio General Plan, 2019; Indio General Plan Environmental Impact Report, 2019.

a) **Less Than Significant Impact.** The perception and uniqueness of scenic vistas and visual character can vary according to location and composition of its surrounding context. The subjective value of views is generally influenced by the presence and intensity of neighboring man–made improvements, such as structures, overhead utilities, and landscape, often in relation to the aesthetic quality offered by a natural background that may include open space, mountain ranges, or a natural landmark feature. The proximity and massing of structures, vegetation and other visual barriers interacts with the visibility of surrounding environments to restrict or enhance local characteristic views.

According to the City of Indio General Plan (GP) Environmental Impact Report (EIR), scenic vistas or public views are defined as views of scenic resources from public locations. Scenic viewpoints can be defined as singular vantage points that offer an unobstructed view of expansive visible landscape components. Due to the City's physical setting in the Coachella Valley, scenic views of the Santa Rosa, San Jacinto, and Little San Bernardino Mountains, Indio Hills, and other undeveloped hilly areas are available throughout the City.

The proposed project area encompasses approximately 5.14 acres south of Indio Boulevard. The project setting does not include any on-site natural landmarks or features with a unique aesthetic value. The project is characterized by developed industrial uses in the northwestern portion of the site, and disturbed vacant land in the southeastern portion of the site. The project site has been disturbed from previous development/construction activities. Approximately 3.3 acres of the property are developed with one primary building, accessory metal-frame structures, and associated parking lot and paved areas being utilized for administration, design, and distribution operations by a commercial lighting business. The primary driveway access and parking lot are found at the north-end of the property. The remaining 1.84 acres of the site (in the southeast portion of the property) exists in a vacant and unpaved condition. The vacant yard is characterized by deposits of various

abandoned materials from unknown sources, including stockpiles of soil, green waste, and demolished material, as well as vehicle tires, miscellaneous debris, and two parked vehicles in an apparent inoperable condition.

The project site is surrounded by industrial and vacant land uses. Specifically, Indio Boulevard and developed industrial properties to the north; industrial uses to the west; property to the east includes various commercial and automotive and business operations. One of the neighboring uses includes a residential structure with frontage on Indio Boulevard, and vacant land to the south. Railroads and the Interstate 10 freeway is also located north of the project, separated from the project site by Indio Boulevard. Single family residential homes are located approximately 200 feet south of the project boundary. The project property and surrounding uses are located within the City of Indio's Industrial Park District (IP) zone. This zone is intended to permit more intensive types of industrial operations and facilities.

As previously stated, scenic resources viewed within the City include the surrounding mountains. Depending on viewpoint location, views of these scenic resources are unobstructed. From the project site, views of the Santa Rosa Mountains to the south are partially obstructed by existing structures, landscaping and infrastructure. The San Jacinto Mountains to the west are also partially obstructed by existing structures, landscaping, and infrastructure. Peak views of the Santa Rosa and San Jacinto Mountains are visible from many locations on the project site and the public roadway and site access point north of the project (Indio Boulevard). The Little San Bernardino Mountains and Indio Hills to the north are largely obstructed by the landscaping between the train tracks north of Indio Boulevard and the Interstate 10 freeway (I-10). The landscaping here consists of a row of tamarisk trees, which create a visual barrier, obstructing views of the north-lying land features. The tamarisks trees are cut seasonally for maintenance; however, the trees grow back quickly. Peak views of the Little San Bernardino Mountains and Indio Hills can be viewed from the project site and the surrounding properties.

The project site is partially developed on 3.3 acres of the 5.14-acre site with industrial uses (commercial lighting building) and accessory buildings. The project does not propose changes to the existing main commercial lighting building. This building will continue to operate. The additional structure currently located south of the commercial lighting building will be demolished and a new building will be developed in its place. The project proposes the development of five storage buildings and an office building on the remaining project site (approximately 3.58 acres). The proposed office building will be 1,000 square feet, and the proposed storage buildings will be a total of 91,696 square feet, for a total of 92,696 square feet of proposed building. The project also proposes access roads, hardscape, parking areas, and landscaped areas.

The proposed buildings will be consistent with the existing industrial context in which the project is located. The proposed office building will be a maximum of 22 feet in height, while the storage buildings will not exceed 16 feet in height. These heights are typical for industrial land uses within IP zones. The proposed buildings will be separated from the public roadway, Indio Boulevard, by a proposed driveway, landscaping, parking spaces and pedestrian pathways. These elements along with the proposed building heights and the setback location of the proposed buildings will not substantially obstruct views of the south-lying mountains when viewed from Indio Boulevard beyond existing obstructions. The project will not obstruct views of the San Jacinto Mountains to the west, and Little San Bernardino Mountains to the north, when viewed from Indio Boulevard since the project is situated south of the roadway.

The residential structures located approximately 200 feet south of the project, have partially obstructed views of the Little San Bernardino Mountains to the north, when viewed from their properties. Although base and mid-range views of the Mountains are largely obstructed by existing buildings, landscaping and manmade infrastructure, peak views can be observed. The proposed project structures are set back from the south-lying residential dwellings by approximately 200 feet. Additionally, the proposed building heights for the storage buildings (closest to the residential properties) will not exceed 16 feet in height. Therefore, the project's proposed buildings will not obstruct views of the northern mountains when viewed from the residential dwellings.

Overall, impacts to scenic vistas will be less than significant.

Cumulative Impacts: None
Mitigation Measures: None

b) **Less than Significant Impact.** The project site encompasses approximately 5.14 acres of land south of Indio Boulevard. Approximately 3.3 acres of the property is developed with one primary building, accessory metal-frame structures, and associated parking lot and paved areas being utilized for administration, design, and distribution operations by a commercial lighting business. The remaining southeast portion (approximately 1.84 acres) remains in a vacant and unpaved condition. The project site lacks any natural landmarks, historic buildings, or rock outcroppings.

The purpose of the State Scenic Highway Program is to preserve and protect scenic State highway corridors from change that would diminish the aesthetic value of lands adjacent to highways. State highways can be officially designated as Scenic Highways or be determined to be eligible for designation. The status of a state scenic highway changes from eligible to "officially designated" when a local jurisdiction adopts a scenic corridor protection program, and the California Department of Transportation (Caltrans) approves the designation as a Scenic Highway. Based on the Caltrans Scenic Highway Mapping System web site, the project is not located adjacent to or near any state eligible or designated scenic highway. The closest officially designated scenic highway is State Route 74, located approximately 8.22 miles southwest of the project site.

Although there are no adopted designated scenic corridors, or vista points/viewpoints in the City, the County of Riverside Western Coachella Valley Area Plan (WCVAP) identifies U.S. I-10 and Dillon Road as County-eligible scenic highways, since both highways provide views of the desert and mountains in the region. The project property is not located near these County-eligible scenic highways.

Less than significant impacts are anticipated.

Cumulative Impacts: None
Mitigation Measures: None

c) **Less than Significant Impact.** The approximately 5.14-acre project property is located in a relatively developed and urban context in the City of Indio, south of Indio Boulevard. The surrounding land uses include industrial uses to the west and east, vacant land to the south, and Indio Boulevard to the north. As stated in discussion a) above, the project is characterized by developed industrial uses in the northwestern portion of the site, and disturbed vacant land in the southeastern portion of the site. The project site has been disturbed from previous development/construction activities. Approximately 3.3 acres of the property are developed with one primary building, accessory metal-frame structures, and associated parking lot and paved areas being utilized for administration, design, and distribution operations by a commercial lighting business. The primary driveway access and parking lot are found at the north-end of the property. The remaining 1.84 acres of the site (in the southeast portion of the property) exists in a vacant and unpaved condition. The vacant yard is characterized by deposits of various abandoned materials from unknown sources, including stockpiles of soil, green waste, and demolished material, as well as vehicle tires, miscellaneous debris, and two parked vehicles in an apparent inoperable condition. The uses surrounding the project to the east and west also exhibit similar features. The industrial land uses make up the visual character of the area.

The project site is located within a developed context within the City of Indio. The project is located within the City's Industrial Park District (IP) zoning designation. IP designations are intended to permit more intensive types of industrial operations and facilities. The IP zoning designation governs the scenic quality of the project site and surrounding area.

The project site, which is developed on 3.3 acres of the site with industrial uses (commercial lighting building) and accessory buildings. The project does not propose changes to the existing commercial lighting building. This building will continue to operate. The additional structure currently located south of the commercial lighting building will be demolished and a new building will be developed in its place. The project proposes the development of five storage buildings and an office building on the project site. The proposed office building will be 1,000 square feet, and the proposed storage buildings will be a total of 91,696 square feet, for a total of 92,696 square feet of proposed building. The project also proposes access roads, hardscape, parking areas, and landscaped areas.

The proposed building frontages will consist of flat metal panels, metal canopy, corrugated metal, accent features, roll-up doors for the storage units, and cement masonry blocks. These proposed building materials are typical of industrial facilities. The proposed office building will be a maximum of 22 feet in height, while the storage buildings will not exceed 16 feet in height. These heights are typical for industrial land uses within IP zones. The proposed buildings will be separated from the public roadway, Indio Boulevard, by the project driveway landscaping, parking spaces and pedestrian pathways. The proposed architectural design of the site will ensure a visually unified industrial project that emphasizes the mixing of materials, use of landscaping and canopies to create a unique and interesting building façade. The landscaping design in the project interior, along its edges, and frontage will include a mixture of trees, palms, shrubs and groundcover plantings to serve as an enhancement to the site design and streetscape.

As such, the project is not anticipated to degrade the existing scenic quality of the site and its surroundings. Project design, including architecture and landscape architecture, will be subject to City review and approval, thus ensuring that aesthetic considerations are addressed in the design. Less than significant impacts are anticipated to result from project implementation.

Cumulative Impacts: None

Mitigation Measures: None

d) **Less than Significant Impact.** The project property, which currently includes an existing building and associated parking spaces, contributes to the existing source of glare or light in the area. In the project surroundings, existing sources of fixed low-intensity nighttime lighting are attributed to residential uses approximately 200 feet to the south, consisting of wall-mounted, downward-oriented light fixtures in the common areas, private patios, side and front yards of homes. However, existing perimeter walls and landscaping treatments on these respective properties shield the dispersion of light, thus maintaining a low ambient light condition. Industrial uses are located to the west and a mix of industrial, commercial and residential use are found to the east of the project and also contribute to the existing nighttime ambient light condition. Light generated by these uses typically include downward-oriented wall-mounted exterior lights along building frontages, downward-oriented post-mounted exterior lights in parking areas and along pedestrian pathways, and lighting for signage. Downward-oriented, post-mounted lights illuminate Indio Boulevard, to the north. Additionally, day-time and nighttime lighting can be attributed to the existing vehicular traffic along the surrounding roadways.

The proposed storage facility development is expected to include low-intensity nighttime light ambient setting that is compatible with the City's Outdoor Lighting Requirements and existing surrounding communities. These requirements are established in an effort to minimize light pollution and trespassing. Light fixtures will be implemented to safely illuminate the entry point and certain perimeter landscaped areas, while the private patios, side yards and front yards of homes will be illuminated primarily with wall-mounted, downward-oriented fixtures. The lighting strategy will ensure that the proposed placement, orientation and intensity of exterior light fixtures provide the necessary on-site coverage, while preventing light spillage onto adjoining

properties by ensuring that the illumination is sufficiently diminished at the project edges and adjacent properties. Light generated from the project will be similar to the lighting in the existing industrial areas east and west of the site. Lighting will include downward-oriented light fixtures to illuminate parking areas, pedestrian pathways, building entrances, signs, and other features. Lighting for pathways and signs shall be installed as needed for security and safety purposes. Project lighting plans will be reviewed by the City.

Pertaining to glare and reflectivity, all buildings will incorporate a mix of materials including metal, corrugated metal, and concrete masonry blocks as determined through separate Design Review applications. These materials do not have highly reflective properties or other surface conditions that would cause substantial daytime or nighttime glare. With the proposed perimeter wall plan and landscaping treatment, the visibility of nighttime light sources resulting from the project are expected to be diminished. Less than significant impacts are anticipated.

Cumulative Impacts: None
Mitigation Measures: None

2. AGRICULTURE AND FORESTRY RESOURCES – In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
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, timberland, or timberland zoned Timberland Production?	☐	☐	☐	☒
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?	☐	☐	☒	☐

Sources: *California Farmland Mapping and Monitoring Program*, California Department of Conservation, 2016; Indio General Plan, 2019.

a) **Less than Significant Impacts.** According to the 2016 California Farmland Mapping and Monitoring Program data the property is designated as Urban and Built-Up Land. Urban and Built-Up Land is occupied by structures with a building density of at least 1 unit to 1.5 acres, or approximately 6 structures to a 10-acre parcel. Common examples include residential, industrial, commercial, institutional facilities, cemeteries, airports, golf courses, sanitary landfills, sewage treatment, and water control structures. The subject site and the properties on all sides of the project are classified as Urban and Built-Up Land. This designation covers a large portion of the City of Indio, and according to the City General Plan 2020 the loss of agricultural land was specifically anticipated as part of the General Plan 2020 Environmental Impact Report. In regards to conversion of a farmland to a non-agricultural use, less than significant impacts are anticipated from the proposed project.

Cumulative Impacts: None

Mitigation Measures: None

b) **No Impact.** The project site is not located in an existing zoning for agricultural use or classified as farm land. According to the Williamson Act Land Conservation Act Map 2015-2016, no portion of land within a one-mile

radius is recognized as being under a Williamson Act Contract. The proposed project will not impact or remove land from the City or County's agricultural zoning or agricultural preserve. No impacts are expected.

Cumulative Impacts: None
Mitigation Measures: None

c) **No Impact.** The proposed project will occur in an existing urban desert setting zoned for industrial use. Surrounding land uses consist of urban and industrial land uses. No forest land, timberland or Timberland Production zoning occurs on the project site or in the surrounding area because forest vegetation is not characteristic of the Coachella Valley desert environment. No impacts are anticipated.

Cumulative Impacts: None
Mitigation Measures: None

d) **No Impact.** The proposed project will occur in an existing urban desert setting. No forest land occurs on the Project site or in the surrounding area because forest vegetation is not characteristic of the Coachella Valley desert environment. No impacts are expected.

Cumulative Impacts: None
Mitigation Measures: None

e) **Less than significant Impact.** As previously described, the project site and vicinity are designated by the City of Indio Zoning maps for industrial use. The proposed project will not result in conversion of any farmland or forest land because no farmland or forest land is situated within or adjacent to the project. Less than significant impacts are anticipated.

Cumulative Impacts: None
Mitigation Measures: None

3. AIR QUALITY – Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
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?	☐	☐	☒	☐

Sources: *Final 2016 Air Quality Management Plan* (AQMP), by SCAQMD, March 2017; *Final 2003 Coachella Valley PM10 State Implementation Plan* (CVSIP), by SCAQMD, August 2003; *Analysis of the Coachella Valley PM10 Redesignation Request and Maintenance Plan*, by the California Air Resources Board, February 2010; South Coast AQMD Rule Book; California Emissions Estimator Model (CalEEMod) Version 2020.4.0, California Air Pollution Officers Association (CAPCOA) and California Air Districts.

Summary of Existing Air Quality Regulatory Framework:

The project site and Coachella Valley regional context are situated within the Riverside County portion of the Salton Sea Air Basin (SSAB), under jurisdiction of the South Coast Air Quality Management District (SCAQMD) and the adopted 2016 Air Quality Management Plan (2016 AQMP). The 2016 AQMP serves as a regional blueprint toward achieving the National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS) with the most current strategies to effectively reduce emissions, accommodate growth, and minimize any negative fiscal impacts of air pollution control on the economy. The 2016 AQMP also accounts for information and assumptions from the 2016 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) to support the integration of land use and transportation toward meeting the federal Clean Air Act requirements. Local air quality in relation to the applicable standards for criteria air pollutants is measured three established Coachella Valley monitoring stations that are part of the SCAQMD Monitoring Network Plan: Palm Springs (AQS ID 060655001), Indio (AQS ID 060652002), and Mecca (Saul Martinez - AQS ID 060652005). The 2016 AQMP also provides guidance for the State Implementation Plans (SIP) for attainment of the applicable ambient air quality standards.

Particulate Matter (PM10):

As indicated in the 2016 AQMP, the Coachella Valley is currently designated as a serious nonattainment area for PM10 (particulate matter with an aerodynamic diameter of 10 microns or less). In the Coachella Valley, the man-made sources of PM10 are attributed to direct emissions, industrial facilities, and fugitive dust resulting from unpaved roads and construction operations. High-wind natural events are also known contributors of PM10. The Clean Air Act (CAA) requires those states with nonattainment areas to prepare and submit the corresponding State Implementation Plans (SIPs) to demonstrate how these areas will attain the National Ambient Air Quality Standards (NAAQS). The implementation strategies include modeling, rules, regulations, and programs designed to provide the necessary air pollutant emissions reductions.

Pertaining to PM10 attainment, the Final 2003 Coachella Valley PM10 State Implementation Plan (CVSIP) was approved by the U.S. Environmental Protection Agency (EPA) on December 14, 2005. It incorporated updated planning assumptions, fugitive dust source emissions estimates, mobile source emissions estimates, and attainment modeling with control strategies and measure commitments. Some of those measures are reflected in SCAQMD Rules 403 and 403.1, which are enacted to reduce or prevent man-made fugitive dust sources with their associated PM10 emissions. The CVSIP established the controls needed to demonstrate expeditious attainment of the standards such those listed below:

- Additional stabilizing or paving of unpaved surfaces, including parking lots;
- A prohibition on building new unpaved roads;
- Requiring more detailed dust control plans from builders in the valley that specify the use of more aggressive and frequent watering, soil stabilization, wind screens, and phased development (as opposed to mass grading) to minimize fugitive dust;
- Designating a worker to monitor dust control at construction sites; and
- Testing requirements for soil and road surfaces.

On February 25, 2010, the ARB approved the 2010 Coachella Valley PM10 Maintenance Plan and transmitted it to the U.S. EPA for approval. With the recent data being collected at the Coachella Valley monitoring stations, consideration of high-wind exceptional events, and submittal of a PM10 Re-designation Request and Maintenance Plan, a re-designation to attainment status of the PM10 NAAQS is deemed feasible in the near future according to the 2016 AQMP.

Ozone and Ozone Precursors:

The Coachella Valley portion of the Salton Sea Air Basin (SSAB) is deemed to be in nonattainment for the 1997 8-hour ozone standard. Coachella Valley is unique in its geography due to its location downwind from the South Coast Air Basin (SCAB). As such, when high levels of ozone are formed in the South Coast Air Basin, they are transported to the Coachella Valley. Similarly, when ozone precursors such as nitrogen oxides (NOx) and volatile organic compounds (VOCs) are emitted from mobile sources and stationary sources located in the South Coast Air Basin, they are also transported to the Coachella Valley. It is worth noting that SCAQMD has found that local sources of air pollution generated in the Coachella Valley have a limited impact on ozone levels compared to the transport of ozone precursors generated upwind in SCAB.

The U.S. EPA classifies areas of ozone nonattainment (i.e., Extreme, Severe, Serious, Moderate or Marginal) based on the extent to which an area exceeds the air quality standard for that pollutant. The higher the exceedance level, the more time is allowed to demonstrate attainment in recognition of the greater challenge involved. However, nonattainment areas with the higher classifications are also subject to more stringent requirements. In the 2016 AQMP, the attainment target date for the 1997 8-hour ozone standard was listed as June 15, 2019. However, based on recent data for higher levels of ozone experienced in 2017 and 2018, it was determined that the Coachella Valley region could not practically attain the said standard by the established deadline. Given that additional time is needed to bring the Coachella Valley into attainment of the ozone standard, SCAQMD submitted a formal request to the United States Environmental Protection Agency (U.S. EPA) to reclassify the Coachella Valley from Severe-15 to Extreme nonattainment, with a new attainment date of June 15, 2024. The reclassification ensures that the Coachella Valley will be given the needed extension to make attainment feasible and prevent the imposition of the non-attainment fees on major stationary sources. This process would also require SCAQMD to develop or update the State Implementation Plan (SIP) documentation to demonstrate how the area will meet the standard on or before June 15, 2024.

SCAQMD continues to reduce ozone and improve air quality in the Coachella Valley, in part by providing more than $50 million in grant funding towards paving dirt roads and parking lots, clean energy projects and cleaner

vehicles. Future emission reductions anticipated to occur in the South Coast Air Basin associated with current and planned regulations on mobile and stationary sources are expected to contribute to improvements in ozone air quality in the Coachella Valley and lead to attainment of the standard.

Methodology:

This air quality analysis relies in part on the quantitative results of running the California Emissions Estimator Model (CalEEMod, Version 2020.4.0), which is computer software developed in conjunction with the California Air Pollution Control Officers Association (CAPCOA) and California Air Districts to calculate criteria air pollutants and greenhouse gas emissions from land use projects using widely accepted methodologies. Sources of these methodologies and data include, but are not limited to, the United States Environmental Protection Agency (USEPA) AP-42 emission factors, California Air Resources Board (CARB) vehicle emission models, studies commissioned by California agencies such as the California Energy Commission (CEC) and CalRecycle. In addition, some local air districts provided customized values for their data and existing regulation methodologies for use for projects located in their jurisdictions.

To assist lead agencies in determining the significance of air quality impacts from land development projects, SCAQMD established quantitative short-term construction-related and long-term operational impact thresholds as part of the South Coast AQMD Air Quality Significance Thresholds. Table III-1 displays these numeric thresholds applicable to construction and operational activities, to which the project-specific air emissions results will be compared respectively.

Table III-1
SCAQMD's Air Quality Significance Thresholds (Pounds/Day)

Emission Source	CO	VOC	NOx	SOx	PM10	PM2.5
Construction or Operation	550	75	100	150	150	55

Source: Air Quality Analysis Guidance Handbook and SCAQMD Air Quality Significance Thresholds, April 2019

As part of the methodology, the project specific CalEEMod 2020.4.0 analysis accounted for the proposed development parameters (land uses and facility dimensions) as model inputs for calculating the associated criteria air pollutants. The CalEEMod land use options do not include self-storage facilities, such as Land Use Code 151 per the Institute of Transportation Engineers (ITE). Therefore, industrial park was considered the most related facility type to utilize for air emissions purposes. The proposed building area of 92,427 square feet and parking lot area of 1.20 acres (stalls, driveways and hardscape) were factored into the model.

a) **Less than Significant Impact.** The quantitative findings included in Table III-2 below demonstrate that the peak unmitigated criteria air pollutant emissions resulting from project construction activities, such as demolition, site preparation, grading, building construction, architectural coating, and paving, will not exceed the applicable SCAQMD Air Quality Significance Thresholds for criteria pollutants, including PM10 and Ozone precursors. As a standard requirement, dust control measures will be implemented during construction as part of a City-approved fugitive dust control plan in accordance with SCAQMD Rule 403/403.1 and Indio Municipal Code Chapter 152 (Dust Control). Thus, a less than significant impact would occur for the construction-related emissions in relation to the applicable South Coast AQMD Air Quality Significance Thresholds.

Table III-2
Short Term Air Pollutant Emissions
Associated With Construction of the Proposed Project (Unmitigated) (Pounds/Day)

	ROG/VOC	NOx	CO	SO2	PM10	PM2.5
Peak Emissions Resulting from Demolition, Site Preparation, Grading, Building Construction, Paving, and Architectural Coating	23.5230	54.0007	35.8407	0.0703	6.6512	4.4896
SCAQMD Air Quality Significance Threshold	75	100	550	150	150	55
Threshold Exceeded	No	No	No	No	No	No
Note: The PM10 and PM2.5 emissions account for required compliance with Indio Municipal Code Chapter 152 (Dust Control) and SCAQMD Rules 403 and 403.1.						

CalEEMod 2020.4.0 was also used to calculate the long-term operational air pollutant emissions that would occur during the life of the project, including area, energy and mobile sources. As shown in Table III-3 below, the project-related peak operational emissions of criteria pollutants are also not expected to exceed any of the South Coast AQMD Air Quality Significance Thresholds. Therefore, a less than significant impact is expected for operational emissions from the project.

Table III-3
Long Term Operational Air Pollutant Emissions
Associated With Development of the Project (Unmitigated) (Pounds/Day)

Emission Source	ROG/VOC	NOx	CO	SO2	PM10	PM2.5
Peak Area Sources, Energy Use, Mobile Sources	2.3400	1.3810	2.4174	0.0114	0.8520	0.2366
SCAQMD Air Quality Significance Threshold	75	100	550	150	150	55
Threshold Exceeded	No	No	No	No	No	No

In addition to the emission levels discussed above, another measure of determining consistency with the governing AQMP is outlined in Chapter 12, Section 12.2 and Section 12.3 of SCAQMD's CEQA Air Quality Handbook (1993), as provided and evaluated below:

Consistency Criterion No. 1: The proposed project will not result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations or delay the timely attainment of air quality standards or the interim emissions reductions specified in the AQMP.

The relevant emission standards are compiled in the South Coast AQMD Air Quality Significance Thresholds and also provided in Table III-1 pertaining to construction and operation. As demonstrated by the CalEEMod results in Tables III-3 and III-4, the proposed project would not result in emission levels exceeding the AQMD Air Quality Significance Thresholds for any criteria air pollutant category, including PM10 and ozone precursors, and therefore would not conflict with the AQMP according to this criterion.

Consistency Criterion No. 2: The project will not exceed the assumptions in the AQMP based on the years of project build-out phase.

The proposed scale and location of the self-storage facility within the existing Industrial Park (IP) zoning designation and Workplace Employment District land use designation is not expected to incur growth above what has been accounted for in the locally adopted land use plans and 2016 AQMP.

In summary, the project is not expected to result in emission levels, population growth or land use changes that would interfere with the City or region's ability to comply with the most current air quality plans, such as the 2016 AQMP and State Implementation Plan strategies for PM10 and ozone level attainment efforts. Moreover, the project's short-term construction and long-term operational emissions would not exceed the established regional thresholds for criteria air pollutant emissions. Less than significant impacts are anticipated.

Cumulative Impacts: None
Mitigation Measures: None

b) **Less than Significant Impact.** The Coachella Valley portion of the Salton Sea Air Basin (SSAB) was formerly classified as "Severe-15" nonattainment for the 1997 8-hour ozone national ambient air quality standard with an attainment deadline of June 15, 2019. Over the past 15 years, the air quality in the Coachella Valley has steadily improved because of the implementation of emission control measures by SCAQMD and California Air Resources Board (CARB). However, in 2017 and 2018, higher ozone levels were experienced throughout the State of California due to changes in meteorology, biogenic emissions, and/or anthropogenic emissions. As a result of the higher ozone experienced in 2017 and 2018, it was determined that the Coachella Valley could not practically attain the 1997 8-hour ozone standard by the 2019 deadline. The inability to attain the standard is largely due to weather conditions that are impacting not only the Coachella Valley and the South Coast Air Basin, but the entire State of California and Western United States. As a result, SCAQMD requested a reclassification that would extend the attainment deadline to June of 2024. The reclassification has allowed South Coast AQMD up to five years to reach attainment. SCAQMD has prepared additional documentation and will be implementing additional measures to comply with the June 2024 deadline. Current and planned regulations on mobile and stationary sources are expected to contribute to improvements to ozone air quality in the Coachella Valley.

As demonstrated in tables III-2 and III-3, project-related short-term construction and long-term operational emissions would not exceed the regional thresholds of significance established by SCAQMD for ozone precursors, such as NOx and ROG/VOC. By complying with the established SCAQMD thresholds, the proposed development is also complying with the overall attainment strategies reflected in the currently adopted 2016 AQMP.

The Coachella Valley is currently designated as a serious nonattainment area for PM10 (particulate matter with an aerodynamic diameter of 10 microns or less). The U.S. EPA-approved Coachella Valley PM10 State Implementation Plan is in place with an attainment strategy for meeting the PM10 standard. Some of the existing measures include the requirement of detailed dust control plans from builders that specify the use of more aggressive and frequent watering, soil stabilization, wind screens, and phased development to minimize fugitive dust.

Chapter 152 (Dust Control) of the Indio Municipal Code requires that a Fugitive Dust Control Plan be prepared and approved prior to any ground disturbance operations involving an area of more than 5,000 square feet. Implementation of the Fugitive Dust Control Plan is required to occur under the supervision of an individual with training on Dust Control in the Coachella Valley. The plan will include methods to prevent sediment track-out onto public roads, prevent visible dust emissions from exceeding a 20-percent opacity, and prevent visible dust emissions from extending more than 100 feet (vertically or horizontally from the origin of a source) or crossing any property line. The most widely used measures include proper construction phasing, proper maintenance/cleaning of construction equipment, soil stabilization, installation of track-out prevention devices,

and wind fencing. As shown in tables III-2 and III-3, project-related short-term construction and long-term operational emissions are not expected to exceed the reginal thresholds of significance established by SCAQMD for PM10.

Since project-related emissions would be consistent with the Air Quality Management Plan, the Coachella Valley PM10 and Ozone SIP, and all SCAQMD Air Quality Significance Thresholds, long-term operational air quality impacts associated with the project should not be considered cumulatively considerable. Less than significant impacts are anticipated.

Cumulative Impacts: None
Mitigation Measures: None

c) **Less than Significant Impact.** A sensitive receptor is a person or group in the population particularly susceptible (i.e., more susceptible than the population at large) to health effects due to exposure to an air contaminant. Sensitive receptors and the facilities that house them are of particular concern if they are located in close proximity to localized sources of carbon monoxide, toxic air contaminants, or odors. Residences, long-term health care facilities, schools, rehabilitation centers, playgrounds, convalescent centers, childcare centers, retirement homes, and athletic facilities are generally considered sensitive receptors.

The SCAQMD has developed and published the Final Localized Significance Threshold (LST) Methodology to help identify potential impacts that could contribute or cause localized exceedances of the federal and/or state ambient air quality standards (NAAQS/CAAQS). LST methodology was developed in response to environmental justice and health concerns raised by the public regarding exposure of individuals to criteria pollutants in local communities. The purpose of analyzing LSTs is to determine whether a project may generate significant adverse localized air quality impacts in relation to the nearest exposed sensitive receptors, such as those listed above. LSTs represent the maximum emission levels that comply with the most stringent applicable federal or state ambient air quality standard at the nearest sensitive receptor, taking into consideration ambient concentrations in each source receptor area (SRA), project, size, and distance to the sensitive receptor. Therefore, meeting the lowest allowable emissions thresholds translates to meeting the most stringent air quality standards for a project locality in consideration of sensitive receptors. As part of the LST methodology, SCAQMD has divided its jurisdiction into 37 source receptor areas (SRAs) which can be used to determine whether a project may generate significant adverse localized air quality impacts. The proposed development is located in SRA 30, which covers the Coachella Valley and City of Indio. LSTs only apply to certain criteria pollutants: carbon dioxide (CO), oxides of nitrogen (NOx) particulate matter equal to or less than 10 microns in diameter (PM10), and particulate matter equal to or less than 2.5 microns in diameter (PM2.5).

The vacant infill site is located within an Industrial Park zoning designation and is surrounded by various commercial, automotive and fabrication business operations. One of the neighboring uses includes a residential structure with frontage on Indio Boulevard. As a result of these distances and to utilize the most conservative measures, the LST analysis utilized the shortest separation interval (25 meters/82 feet) as the basis for analysis.

Table III-4
Localized Significance Thresholds (LSTs) Associated with Construction of the Revised Project with Receptors at 25 Meters (82 Feet), (In Pounds/Day)

Emission Source	NOx	CO	PM10	PM2.5
Peak Unmitigated Construction Emissions	54.0007	35.8407	6.6512	4.4896
SCAQMD LST Threshold for SRA 30	304	2,292	14	8
LST Threshold Exceeded?	No	No	No	No

Sources: CalEEMod Results and AQMD LST Look-Up Tables
Note: The PM10 and PM2.5 emissions factor dust control compliance with SCAQMD Rule 403 and 403.1 and Indio Municipal Code requirements under Chapter 152 (Dust Control)

The results provided in Table III-4 resulting from the Localized Significance Thresholds methodology demonstrate that the construction-related emission levels would occur below the established thresholds, taking into account the source receptor area and nearest sensitive receptor location to the project. Therefore, the project would not result in emissions capable of exposing sensitive receptors to localized substantial pollutant concentrations. Less than significant impacts are anticipated.

Cumulative Impacts: None
Mitigation Measures: None

d) **Less than Significant Impact.** As previously analyzed and disclosed, project implementation would not result in emissions that would exceed the applicable South Coast AQMD Air Quality Significance Thresholds or Localized Significance Thresholds. The proposed self-storage operations within enclosed structures is not expected to include operations commonly known to generate odors. Therefore, the project is not expected to result in odor or other emissions adversely affecting nearby neighbors or a substantial number of people. Less than significant impacts are anticipated.

Cumulative Impacts: None
Mitigation Measures: None

4. **BIOLOGICAL RESOURCES** -- Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
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 Wildlife 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, and regulations or by the California Department of Fish and Wildlife or US 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?	☐	☐	☐	☒
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?	☐	☐	☐	☒

Sources: Indio General Plan, 2019; Coachella Valley Multiple Species Habitat Conservation Plan.

a) **Less Than Significant with Mitigation Incorporated.** The project site is developed with one primary building, accessory metal-frame structures, and associated parking lot and paved areas by an existing commercial lighting business. Approximately half of the primary building distinctively serves as a warehousing area with commercial pallet racks for boxed commercial lighting products. The remaining southeast portion (approximately 1.84 acres) remains in a vacant and unpaved condition. The vacant yard is characterized by deposits of various abandoned materials from unknown sources, including stockpiles of soil, green waste, and demolished material, as well as vehicle tires, miscellaneous debris, and two parked vehicles in an apparent inoperable condition. The undeveloped portion of the site has been subject to routine ground maintenance. Because of the routine ground maintenance, existence of soil piles, and friable soils at the project site, suitable habitat for burrowing owls exist on the undeveloped portion of the project site. Although suitable habitat may exist at the site, the project site is surrounded by industrial uses and vacant land and adjacent to Indio Boulevard, a busy four-lane highway. As a result of the site disturbance and its surroundings, the project site does not provide ideal conditions that would support natural vegetation communities or habitats including the presence of plant or animal species given special status by government agencies. However, as previously stated, the presence of soil piles and friable soils provides potential habitat for burrowing owls. For this reason, a burrowing owl clearance survey should be undertaken no less than 14 days prior to ground disturbance and 24 hours prior to site disturbance. The purpose of the survey is to make sure no owls are present during site development.

The property is within the Coachella Valley Multiple Species Habitat Conservation Plan (CVMSHCP), which outlines policies for conservation of habitats and natural communities. The project site is not located within a CVMSHCP Conservation Area and there are no known significant biological resources on the project site. Therefore, the project would not have a substantial adverse impact on candidate, sensitive, or special status species with the implementation of the mitigation measures below.

Cumulative Impacts: None
Mitigation Measures:

BIO-1: The project proponent shall ensure that burrowing owl clearance survey is performed not more than 14 days prior to project site disturbance (clearing, grubbing, grading, and construction), and then again 24-hours prior to site disturbance, as burrowing owls may colonize or recolonize the site within the time between the original survey and project activities. If any owls are identified, the most current protocol established by the California Department of Fish and Wildlife (Burrowing Owl Mitigation) must be followed.

b) **No Impact.** The property does not contain nor is adjacent to any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service. No blue-line stream exists within the project property as depicted on the United States Geological Survey topographic maps or National Hydrography Dataset. The project site is consistent with the designated land use and surroundings. No impact to riparian habitat or sensitive natural community is expected.

Cumulative Impacts: None
Mitigation Measures: None

c) **No Impact.** As previously discussed, the project site has been disturbed for a number of years and does not contain nor is it adjacent to federally protected wetlands, marshes or other drainage features. Therefore, the project will not result in in the direct removal, filing or hydrological interruption. The project will include on-site retention facilities to prevent the direct discharge and hydro-modification impacts of runoff into the local municipal separate storm sewer system and any downstream receiving waters. No impacts are expected to federally protected wetlands.

Cumulative Impacts: None
Mitigation Measures: None

d) **No Impacts.** The project site and adjacent surroundings are part of an industrial area of the City and an existing commercial lighting facility. Given the project sites proximity to the existing development, the project site would not be expected to be a part of or contain migratory wildlife corridors or native wildlife nursery sites. The project site not located near any existing drainages that would support wildlife corridors nor is it located in a known wildlife corridor. Therefore, the proposed project will not interfere with movement of any native resident or migratory fish or wildlife species and no impacts are expected.

Cumulative Impacts: None
Mitigation Measures: None

e) **No Impact.** Project implementation would not result in demolition or tree removal. The proposed site plan provides landscaping improvements along the project edges in a manner consistent with the local development standards. The project will comply with the provisions of the CVMSHCP. There are no other unique local policies or ordinances protecting biological resources that would cause a conflict nor does the site support high

value biological resources that could be affected. There are no applicable tree preservation policies or ordinances and no impacts are expected.

Cumulative Impacts: None
Mitigation Measures: None

f) **No Impact.** The project lies within the boundary of the CVMSHCP which outlines policies for conservation of habitats and natural communities and is implemented by the City of Indio. The project site is not located within a Conservation Area under this plan and there are no known significant biological resources on the project site. The CVMSHCP implements a habitat mitigation fee for new development to support the acquisition of conservation lands. The proposed project will comply with all required plan provisions and pay the required mitigation fee in conformance with the CVMSHCP and City Ordinance. No impacts to local, state or regional conservation plans are expected.

Cumulative Impacts: None
Mitigation Measures: None

5. CULTURAL RESOURCES -- Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	☐	☒	☐	☐
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?	☐	☒	☐	☐
c) Disturb any human remains, including those interred outside of dedicated cemeteries?	☐	☐	☒	☐

Sources: *Cultural Resources Study*, Statistical Research Inc., 2022; Indio General Plan, 2019; Indio General Plan Environmental Impact Report, 2019.

a-b) Less than Significant Impact with Mitigation. Statistical Research Inc. (SRI) prepared a project-specific Cultural Resource Study (August 2022). work presented here included a Class I records search, archival research, the development of a site-specific sensitivity model for buried cultural resources, and a Class III pedestrian survey of the property. The Class I records search at the California Historical Resources Information System Eastern Information Center, Department of Anthropology, University of California, Riverside, was conducted to identify all reports of previously conducted projects and all archaeological resources within the project area and a surrounding 1-mile (1.6-km) buffer, as well as all built-environment resources within the project area and a surrounding 1/2-mile (0.8-km) buffer.

The results of the records search indicate that 84 previous survey projects had been conducted within the records search area, and 3 of those involved the project site. The 3 studies involving the project area were all archaeological assessments associated with Coachella Valley stormwater channels and canal construction. There are 78 previously recorded cultural resources within the 1-mile (1.6-km) records-search area: 48 archaeological sites (6 historical-period, 41 prehistoric, and 1 multicomponent), 24 built-environment resources, and 4 prehistoric isolates. The 6 historical-period sites are 2 trash scatters, 1 agricultural complex, the Coachella Canal, a Union Pacific Railroad line segment, and the Coachella Valley Stormwater Channel. The prehistoric sites consist of at least 5 habitation sites and 38 artifact scatters that include primarily ceramic scatters and a small number of associated lithic artifacts. The multicomponent site is an artifact scatter containing prehistoric ceramics and historical-period glass and ceramics.

In addition to conducting the records search at the CHRIS EIC, SRI also accessed (online) U.S. General Land Office (GLO) records, historical images, historical topographic maps, and other sources of local history pertinent to the project area, to assess the sensitivity of the parcel for buried historical-period resources. Historical imagery indicated that the existing commercial buildings on the property were built sometime after 1984 and that land use prior to that was mostly agricultural. A structure is shown on the property on the 1944 USGS topographic map, near the center of the project area, and it is present on topographic maps dating up to 1991. The structure is visible in historical aerial images dating back to 1953 and is not visible in images dated 1996 or later. Although the structure no longer stands, there may be related artifacts and subsurface deposits, such as buried refuse deposits, irrigation features, and cisterns, that are still intact. No information pertaining to the parcel was found in a review of the GLO records.

SRI reviewed the pertinent geological literature to evaluate the potential that significant buried archaeological resources are present in the project area. The soils, landforms, and geologic units within the study area were classified as either sensitive or nonsensitive for intact buried archaeological resources on the basis of age and geologic context. The geoarchaeological studies of the project area indicate that the project area is sensitive for buried prehistoric resources. This sensitivity classification was further refined to moderate sensitivity based on the records-search results and the City of Indio's Prehistoric Ethnohistoric Cultural Resources Map.

Additionally, based on observations from the historical aerial images and topographic maps, the entirety of the project area appears to be mechanically disturbed agricultural land. In light of that, regardless of the overall sensitivity of the sediments, resources located within the plow zone are likely to exhibit diminished integrity; intact deposits, however, may still exist below the plow zone. That said, the entirety of project area is considered sensitive for buried archaeological resources, and no portions of the project area are identified as nonsensitive for buried cultural resources. The sediments underlying the project area accumulated while humans may have been present on the landscape, and given the depositional environment associated with these sediments, it is unlikely that buried archaeological sites would have been significantly impacted during aggradation events.

No cultural resources were identified during the survey. The surface of the undeveloped portion of the project area has been heavily disturbed by heavy equipment, construction debris, and dumping of modern household refuse from adjacent properties. Large piles of vegetation, wooden pallets, modern structural debris, soil, concrete, and asphalt were observed in the undeveloped portion of the northern extent of the property. Modern pipes and modern refuse are also scattered among the various piles. The rest of the undeveloped portion of the project area has been disturbed by heavy equipment; installation and maintenance of, as well as access to, an on-site utility pole; and development activities on neighboring properties that encroach onto the project area.

Although the records search did not identify any known cultural resources within the project area, a large number of prehistoric archaeological sites are located within the surrounding 1 mile (1.6 km). This records search information, coupled with the buried-sites-sensitivity model developed for this project as well as the City's Prehistoric Ethnohistoric Cultural Resources Map, indicates that the project area has moderate sensitivity for buried prehistoric resources. Archival research identified possible historical-period structures and agricultural activity within the project area, suggesting that related historical-period archaeological deposits could be present just beneath the ground surface. Archaeological survey identified that the surface of the project area has been heavily disturbed, and no indication of prehistoric or historical-period resources was noted. Furthermore, despite the observations made during survey that the surface of the project area is heavily disturbed, subsurface historical-period archaeological deposits related to the structure visible in historical aerial images, such as buried refuse deposits, irrigation features, and cisterns, may be present. To identify and treat unanticipated cultural resources that might be present, SRI recommends that an archaeological monitor be present for all ground-disturbing activities during construction of the self-storage facility. Therefore, less than significant impact are expected with the recommended mitigation measures.

Cumulative Impacts: None
Mitigation Measures:

CUL-1: The presence of a qualified archaeological monitor or Cultural Resource Monitor shall be required during all project related ground disturbing activities (clearing, grubbing and grading). In the event that cultural resources are discovered during project activities, all work in the immediate vicinity of the find (within a 60-foot buffer) shall cease and a qualified archaeologist meeting Secretary of Interior standards shall be hired to assess the find. Work on the other portions of the project outside the buffered area may continue during this assessment period.

c) Less than Significant Impact. The project site is not expected to affect any human remains, including those interred outside of formal cemeteries. Pursuant to the California Health and Safety Code Section 7050.5, and the CEQA Guidelines Section 15064.5 require that in the event of discovery or recognition of any human remains in any location other than a dedicated cemetery, there shall be no further excavation or disturbance of the site, or any nearby area reasonably suspected to overlay adjacent remains, until the County Coroner has examined the remains. If the coroner determines the remains to be Native American or has reason to believe that they are those of Native American, the coroner shall contact by telephone within 24-hours of the Native American Heritage Commission. Pursuant to the mentioned California Health and Safety Code, proper actions

shall take place in the event of a discovery or recognition of any human remains during project construction activities and less than significant impacts are expected.

Cumulative Impacts: None
Mitigation Measures: None

6. ENERGY -- Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
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 of energy efficiency?	☐	☐	☒	☐

Sources: CalEEMod V 2020.4.0, California Air Pollution Officers Association (CAPCOA) and California Air Districts; Indio General Plan, 2019; Indio General Plan Environmental Impact Report, 2019; Indio Climate Action Plan, 2019.

a) **Less than Significant Impact.** The project proposes the development of five storage buildings and an office building on approximately 3.58 acres. The proposed office building will be 1,000 square feet, and the proposed storage buildings will be 91,696 square feet, for a total of 92,696 square feet of proposed building. The project also proposes access roads, hardscape, parking areas, and landscaped areas.

Energy sources are made available to the City of Indio by private and public agencies. Major energy providers include Imperial Irrigation District (IID) and the Southern California Gas Company (The Gas Company or SoCalGas). Electricity and natural gas are the primary sources of energy in the City of Indio.

Title 24 of the California Administrative Code sets efficiency standards for new construction, regulating energy consumed for heating cooling, ventilations, water heating, and lighting. These building efficiency standards are enforced through the City's building permit process. Approximately 3.3 acres of the property are developed with one primary building, accessory metal-frame structures, and associated parking lot and paved areas being utilized for administration, design, and distribution operations by a commercial lighting business. The remaining southeast portion (approximately 1.84 acres) remains in a vacant and unpaved condition. The vacant yard is characterized by deposits of various abandoned materials from unknown sources, including stockpiles of soil, green waste, and demolished material, as well as vehicle tires, miscellaneous debris, and two parked vehicles in an apparent inoperable condition.

The project property is currently served with electricity, which powers the existing outdoor light fixtures and indoor operations, and natural gas, which is used to heat the water fixtures.

The project is expected to consume energy in the form of electricity, natural gas and petroleum during project construction and operation. CalEEMod v2020.4.0 was utilized in the reports to calculate construction-source and operational-source criteria pollutant and GHG emissions from direct and indirect sources and quantify applicable air quality and GHG reductions achieved from mitigation measures. Project-related energy consumption, via electricity, natural gas, and petroleum, is discussed further below.

Electricity

Electricity is provided to the City of Indio by Imperial Irrigation District (IID). IID is the sixth largest electrical utility in California, serving more than 150,000 customers. The IID energy service territory covers 6,471 square miles, including all of Imperial County along with parts of Riverside and San Diego counties. According to the California Energy Commission (CEC) Energy Consumption Database, approximately 3,678.6 gigawatt hours (GWh) of electricity in 2020. The industrial sector of IID's planning area consumed approximately 155.6 GWh in 2020. IID maintains and operates the remission and distribution infrastructure to provide electricity to users throughout the City and provides residents and businesses in its service area with various assistance and renewable energy programs.

Construction

Temporary electrical power for lighting and electronic equipment, such as computers inside interim construction trailers, would be provided by IID. Electricity consumed for onsite construction trailers, which are used by managerial staff during the hours of construction activities, as well as electrically powered hand tools are expected to use a minimal amount of electricity. However, the electricity used for such activities would be temporary and negligible. Most energy used during construction would be from petroleum consumption (discussed further below).

Operation

The project proposes the operation of a storage facility on approximately 3.58 acres of infill land south of Indio Boulevard. The project would not result in the use of excessive amounts of fuel or electricity and would not result in the need to develop additional sources of energy. While energy use at the project would not be excessive, the project would incorporate measures directed at minimizing energy use, such as installing high efficiency lighting. Therefore, reducing the use of electricity during project operation. According to the CalEEMod calculations, the project is expected to generate the demand for approximately 841,148 kWh of annual electricity use for the new storage facility and parking lot, depicted in the table below.

Table VI-1 Operational Electricity Demand

	Electricity Use
Land Use	kWh/yr
Industrial Park	825,780
Parking Lot	15,368
Total	841,148

The IID planning area consumed approximately 3,678.6 gigawatt hours (GWh) of electricity in 2020. The industrial sector of IID's planning area consumed approximately 155.6 GWh in 2020. IID estimates that electricity consumption within IID's planning area will be approximately 4,641,267 MWh annually by 2031. As previously stated, the project is anticipated to consume approximately 841,148 kWh of electricity annually during operation, which is equivalent to 0.841 MWh. Thus, the project would consume approximately 0.00002 percent of IID's demand in 2031. The project would result in the long-term consumption of electricity, however, the increase in demand for the resource would not be substantial. The project proposes the installation of high efficiency lighting onsite. The project will also comply with California Building Code and Energy Code standards to ensure energy efficient technologies and practices are used at the project site.

Natural Gas

The Southern California Gas Company (SoCalGas or the Gas Company) provides natural gas to the City of Indio, serving residential, commercial, and industrial markets. Natural gas is the primary source of energy used in the City for space and water heating, as well as cooking. The Gas Company has major supply lines along Indio Boulevard. SoCalGas also has developed a wide range of energy management, conservation and equipment retrofit programs for its consumer base. Assistance in facilities planning and analysis is also provided by SoCalGas to maximize energy efficiency and cost-effective equipment purchases and operations.

Construction

Natural gas is not anticipated to be required during construction of the project. Fuels used for construction would primarily consist of diesel and gasoline, which are discussed under the following petroleum subsection.

Any minor amounts of natural gas that may be consumed because of project construction would be temporary and negligible and would not have an adverse effect.

Operation

The consumption of natural gas typically is consumed during building heating, and water heating, which will occur during project operation. The project's expected natural gas consumption was calculated the CalEEMod default values for industrial parks and parking lots. Based on the CalEEMod calculations, the project is estimated to consume approximately 320,722 thousand British thermal units (kBTU) of natural gas annually during operation of the project. The parking lot use would not consume natural gas. This is displayed int Table VI-2, Operational Natural Gas Demand, below.

Table VI-2 Operational Natural Gas Demand

	Natural Gas Use
Land Use	kBTU/yr
Industrial Park	320,722
Parking Lot	0
Total	320,722

Note: 320,722 kBTU/yr is approximately 847.3 cf/day per the 1 cf to 1.037 kBTU conversion/365 days.

The project would be designed to comply with Title 24, Part 6, of the CCR, and the City's Sustainability Plan. Based on the 2018 California Gas Report, the California Energy and Electric Utilities estimates natural gas consumption within SoCalGas's planning area will be 2,310 million cf per day in 2030 (California Public Utilities Commission, 2018 California Gas Report, pg. 103). Based on the project's estimated annual natural gas consumption, of 320,722 kBTU (which is equivalent to 847.3 cf per day), the project would account for approximately 0.00004 percent of the 2030 forecasted consumption in SoCalGas's planning area (847.3 cf/day divided by 2,310 million cf/day) and would use the existing infrastructure. Natural gas consumption would be appropriate and not place a significant burden on SoCalGas services. Further, submittal, review, and approval of project plans through City and SoCalGas would ensure future natural gas demands to be manageable. The worst-case scenario project would result in the long-term consumption of natural gas electricity, however, the increase in demand for the resource would not be substantial.

The project would be required to comply with the most recent California Building Code and Energy Code standards to ensure energy efficient technologies and practices are used at the project site. Therefore, the project will not result in the inefficient, wasteful, or unnecessary consumption of natural gas during project operation. Additionally, natural gas consumption would be appropriate and not place a significant burden on SoCal Gas services.

Petroleum

According to CEC, transportation accounts for nearly 37 percent of California's total energy consumption. Petroleum-based fuels account for approximately 92 percent of California's transportation energy sources. Technological advances, market trends, consumer behavior, and government policies could result in significant changes to fuel consumption by type and in total. Various policies, rules and regulations have been enacted to improve vehicle fuel efficiency, promote the development and use of alternative fuels, reduce transportation-source air pollutants and GHG emissions, and reduce vehicle miles traveled (VMT), at the federal and State levels. Technological advances have made use of other energy resources or alternative transportation modes increasingly feasible, as market forces have driven the price of petroleum products steadily upward.

Construction

Petroleum would be consumed throughout construction of the project. Fuel consumed by construction equipment would be the primarily energy resource expended over the course of construction, while VMT associated with the transportation of construction materials and construction worker commutes would also result in petroleum consumption. Heavy-duty equipment used for project construction would rely on diesel fuel, as would haul trucks involved in off-hauling materials from excavation. Construction workers are expected to travel to and from the project site in gasoline-powered passenger vehicles. There are no unusual project characteristics or construction processes that would require the use of equipment that would be more energy intensive that is used for comparable activities or use of equipment that would not conform to current emission standards (and related fuel efficiencies).

Heavy-duty construction equipment of various types would be used during each phase of construction. CalEEMod was used to estimate construction equipment usage. In the analysis of the project the mitigated construction figures were used, based on the assumption that the project will implement applicable mitigation measures. Fuel consumption from construction equipment was estimated by converting the total CO2 emissions from each construction phase to gallons using the conversion factors shown in the following tables.

Table VI-3, Construction Worker Gasoline Demand, illustrates the demand of gasoline fuel for construction worker trips to and from the site during each construction phase, and phase of development. Construction worker gasoline demand during each phase of development equals a total of 5,392.6 gallons of gasoline fuel.

Table VI-3 Construction Worker Gasoline Demand

Phase	Days	Trips	Miles	VMT	KgCO2e	Kg/CO2/Gallon	Gallons
Demolition	20	15	11	3,300	968.9	8.89*	109.0
Site Preparation	10	18	11	1,980	581.4	8.89	65.4
Grading	15	15	11	2,475	726.7	8.89	81.7
Building Const.	230	61	11	154,330	43,675	8.89	4,912.8
Paving	20	20	11	4,400	1,242.8	8.89	139.8
Arch. Coating	20	12	11	2,640	745.7	8.89	83.9
						Total	**5,392.6**

*https://www.epa.gov/energy/greenhouse-gases-equivalencies-calculator-calculations-and-references
https://www.epa.gov/energy/greenhouse-gas-equivalencies-calculator

Table VI-4, Construction Vendor Diesel Demand (below), illustrates the demand of diesel fuel for construction vendor trips to and from the site. These trips are associated with the delivery of construction materials during the construction phase. Construction vendor demand equals a total of 5,402.2 gallons of diesel fuel.

Table VI-4 Construction Vendor Diesel Demand

Phase	Days	Trips	Miles	VMT	KgCO2e	Kg/CO2/Gallon	Gallons
Demolition	20	0	0	0	0	10.18*	0
Site Preparation	10	0	0	0	0	10.18	0
Grading	15	0	0	0	0	10.18	0
Building Const.	230	24	5.40	29,808	54,994	10.18	5,402.2
Paving	20	0	0	0	0	10.18	0
Arch. Coating	20	0	0	0	0	10.18	0
						Total	**5,402.2**

*https://www.epa.gov/energy/greenhouse-gases-equivalencies-calculator-calculations-and-references
https://www.epa.gov/energy/greenhouse-gas-equivalencies-calculator

Table VI-5, Construction Equipment Diesel Demand, displays the demand of diesel fuel for construction vehicles on-site during the various construction phases. Construction equipment diesel demands equals a total of 35,167.4 gallons of diesel fuel.

Table VI-5, Construction Equipment Diesel Demand

Phase	Days	Equipment Units	KgCO2e	Kg/CO2/Gallon	Gallons
Demolition	20	6	34,228.9	10.18	3,362.4
Site Preparation	10	7	16,854.9	10.18	1,655.7
Grading	15	6	19,699.1	10.18	1,935.1
Building Const.	230	9	268,156.6	10.18	26,341.5
Paving	20	8	16,507.2	10.18	1,621.5
Arch. Coating	20	1	2,557.1	10.18	251.2
				Total	**35,167.4**

Overall, the project is estimated to consume approximately 5,392.6 gallons of gasoline and 40,569.6 gallons of diesel fuel during the project's construction phases. In total, the project will consume approximately 45,962.2 gallons of petroleum. Petroleum use is necessary to operate construction equipment. The US EPA applied a Tier 3 program in order to reduce the impacts of motor vehicles on air quality and public health. The vehicle emissions standards will reduce both tailpipe and evaporative emissions from passenger cars, light-duty trucks, medium duty passenger vehicles, and some heavy-duty vehicles. The construction equipment will utilize Tier 3 engines or higher, therefore would be newer off-road equipment units.

The energy used during the construction of the project would be limited to the development of the project and would not require long-term petroleum use. Additionally, there are no unusual project characteristics or construction processes that would require the use of equipment that would be more energy intensive that is used for comparable activities or use of equipment that would not conform to current emissions standards (and related fuel efficiencies). Thus, project construction would not consume petroleum in a wasteful or inefficient manner.

Operation

As previously mentioned, the project proposes a storage facility and associated improvements on infill land south of Indio Boulevard. Paved entry from Indio Boulevard and a revised parking lot associated with the existing commercial lighting building is also proposed as part of the project. Operation of the proposed project would result in vehicle miles traveled and petroleum consumed. According to the the CalEEMod calculations, the project would result in 393,795 VMTs annually. Per the CalEEMod calculations, the average daily trip (ADT) rate will total 139.57 ADT on the weekdays, Saturdays, and Sundays. Total mobile source CO2e is 173.3257 MT per year (or 173,325.7 kg per year). CalEEMod assumes 92.5 percent of VMT burns gasoline, while the remaining 7.5 percent burn diesel. Thus, of the 173,325.7 kg of mobile emissions, 160,326.3 kg is generated by gasoline combustion, and 12,999.4 kg is generated by diesel combustion. Project operation would have an annual petroleum demand of 20,935.7 gallons, as displayed in Table VI-4.

Table VI-4, Operational Petroleum Demand

Land Use	Annual VMT
Industrial Park	393,795
Parking Lot	--
Total	393,795

Table VI-4 Operational Annual Petroleum

	Annual VMT	KgCO2e	Kg/CO2/Gallon	Annual Gallons
Gasoline	364,260.4	160,326.3	8.89	18,034.5
Diesel	29,534.6	12,999.4	10.18	2,901.2
			Total Annual Petroleum	**20,935.7**

Over the lifetime of the project, the fuel efficiency of vehicles in use is expected to increase, as older vehicles are replaced with newer more efficient models. Therefore, it is expected that the amount of petroleum consumed due to the vehicle trips to and from the project site during operation would decrease over time. Additional advancement of technology includes the use of plug-in hybrid and zero emission vehicles in California, which will also decrease the amount of future petroleum consumed in the state. With the foregoing, operation of the project is expected to use decreasing amounts of petroleum over time, due to advances in fuel economy. Given this consideration, petroleum consumption associated with the project operation would not be considered excessive.

In conclusion, the project would increase demand for energy in the project area and in the service areas of IID and SoCalGas. However, based on the findings described above, project construction and operation are not anticipated to result in potentially significant impacts due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation.

Cumulative Impacts: None
Mitigation Measures: None

b) **Less than Significant Impact**. The project proposes the development of five storage buildings and an office building on the project site. The proposed office building will be 1,000 square feet, and the proposed storage buildings will be 91,696 square feet, for a total of 92,696 square feet of proposed building. The project also proposes access roads, hardscape, parking areas, and landscaped areas. As stated in the previous discussion, project development and operation are not anticipated to use an unnecessary amount of energy resources. To ensure the conservation of energy, the State of California and the City of Indio implements various regulations in order to be more energy efficient and reduce the amount of energy consumed and greenhouse gas (GHG) emissions. Some of the State-wide and local regulations are listed below.

Federal Regulations

Intermodal Surface Transportation Efficiency Act of 1991
The Intermodal Surface Transportation Efficiency Act of 1991 (ISTEA) promoted the development of intermodal transportation systems to maximize mobility as well as address national and local interests in air quality and energy. ISTEA contained factors that Metropolitan Planning Organizations (MPOs) were to address in developing transportation plans and programs, including some energy-related factors. To meet the new ISTEA requirements, MPOs adopted explicit policies defining the social, economic, energy, and environmental values guiding transportation decisions.

State Regulations

Assembly Bill 32
Assembly Bill 32 (AB 32) was signed in 2006 to establish and reduce the amounts of greenhouse gases being emitted on a state-wide level. Specifically, AB 32 requires a reduction of emissions to 1990 levels by 2020. It plans to do this by establishing an annual reporting program for significant sources. Energy efficiency goals

listed in AB 32 includes maximizing energy efficiency building and appliance standards, and pursuing additional efficiency efforts including new technologies, and new policy and implementation mechanisms.

CARB Scoping Plan

A specific requirement of AB 32 was to prepare a Climate Change Scoping Plan for achieving the maximum technologically feasible and cost-effective GHG emission reduction by 2020 (Health and Safety Code section 38561(h)). The California Air Resources Board (CARB) developed an AB 32 Scoping Plan that contains strategies to achieve the 2020 emissions cap. The initial Scoping Plan was approved in 2008, and contains a mix of recommended strategies that combined direct regulations, market-based approaches, voluntary measures, policies, and other emission reduction programs calculated to meet the 2020 statewide GHG emission limit and initiate the transformations needed to achieve the State's long-range climate objectives. Updates to the Scoping Plan occurred in 2014 and in 2017.

Assembly Bill 1493/Pavley Regulations

California Assembly Bill 1493 (AB 1493), enacted on July 22, 2002, required CARB to develop and adopt regulations that reduce GHGs emitted by passenger vehicles and light duty trucks. In 2005, the CARB submitted a "waiver" request to the Environmental Protection Agency (EPA) from a portion of the federal Clean Air Act in order to allow the State to set more stringent tailpipe emission standards for CO2 and other GHG emissions from passenger vehicles and light duty trucks. On December 19, 2007, the EPA announced that it denied the "waiver" request. On January 21, 2009, CARB submitted a letter to the EPA administrator regarding the State's request to reconsider the waiver denial. The EPA approved the waiver on June 30, 2009.

Executive Order S-3-05

Executive Order (EO) S-3-05, passed in 2005, established reduction targets of an 80 percent of 1990 levels reduction by 2050, and created agencies to achieve these targets. The passage of this regulation requires the use of more energy efficient practices regarding building development and operation in order to reduce the amount of GHGs produced.

State of California Energy Plan

The California Energy Commission (CEC) is responsible for preparing the State Energy Plan, which identifies emerging trends related to energy supply, demand, conservation, public health and safety, and the maintenance of a healthy economy. The Plan calls for the state to assist in the transformation of the transportation system to improve air quality, reduce congestion, and increase the efficient use of fuel supplies with the least environmental and energy costs. To further this policy, the plan identifies a number of strategies, including assistance to public agencies and fleet operators and encouragement of urban designs that reduce vehicle miles traveled and accommodate pedestrian and bicycle access.

Title 20: Appliance Efficiency Standards

The California Code of Regulations (CCR), Title 20: Division 2, Chapter 4, Article 4, Sections 1601-1608 (Appliance Efficiency Regulations) regulates the sale of appliances in California. The Appliance Efficiency Regulations include standards for both federally regulated appliances and non-federally regulated appliances. 23 categories of appliances are included in the scope of these regulations. The standards within these regulations apply to appliances that are sold or offered for sale in California, except those sold wholesale in California for final retail sale outside the state and those designed and sold exclusively for use in recreational vehicles or other mobile equipment.

Title 24: Building Energy Efficiency Standards and CALGreen Building Standards Code

In addition to Title 20 (Sections 1601-1608) of the CCR, Title 24, parts 6 and 11, also outlines energy efficient building designs for new development. The CCR's 2019 Building Energy Efficiency Standards (Title 24, Part 6), and the CALGreen Building Standards Code (Title 24, Part 11), establish mandatory guidelines and standards requiring more energy efficient new and existing developments. The California Energy Commission

adopted the Building Energy Efficient Standards for all new residential and nonresidential construction to reduce greenhouse gases, as a part of the California Building Code, Title 24. This requires new homes to include at least 50 percent of kitchen lighting to be LED, compact fluorescent or similar high efficiency fixtures, double pane windows, cool roofs, and other design techniques to reduce heat loss. Title 24, Part 11, establishes design and development methods that include environmentally responsible site selection, building design, building siting and development to protect, restore and enhance the environmental quality of the site and respect the integrity of adjacent properties. The proposed project will be required to comply with the state implemented standards for energy efficient new developments.

Local and City Regulations

Sustainable Communities Strategy

The Sustainable Communities and Climate Protection Act of 2008, or Senate Bill 375, coordinates land use planning, regional transportation plans, and funding priorities to help California meet the GHG reduction Mandates of AB 32. The project is located within the Southern California Association of Governments (SCAG) jurisdiction, which has the authority to develop the sustainable communities strategy (SCS) or alternative planning strategy (APS). For the SCAG region, the targets set by the California Air Resources Board (CARB) are at eight percent below 2005 per capita GHG emissions levels by 2020 and 19 percent below 2005 per capita GHG emissions by 2035. These reduction targets became effective October 2018.

Indio Climate Action Plan

The Indio Climate Action Plan (CAP) was adopted by the City in September 2019. The CAP is designed to provide clear policy guidance to City staff and decision-makers on how to reduce greenhouse gas (GHG) emissions. It identifies a pathway to reduce emissions consistent with State-level emissions reduction targets for 2020 and 2030. The path includes strategies for improving connectivity and land use patters, improving transportation modes and systems, incorporating energy efficiency standards, increasing the City's renewable energy supply, and reducing solid waste.

The CAP details strategies and actions in five sectors to achieve the GHG emissions reduction goal. The sectors include clean energy, low-carbon buildings, zero waste, water conservation, and sustainable land use and transportation. Table 5 in the CAP summarizes the sectors as such:

Key Strategies	GHGs Reduced - 2040	Example Tracking Metrics
Clean Energy		
Increase Local Renewable Energy Generation	7,655 $MTCO_2e$	Homes and businesses with solar Local solar generation IID % of renewable energy
Low-Carbon Buildings		
Improve Efficiency of Existing Buildings	18,506 $MTCO_2e$	Electricity and natural gas use (total and per capita) Building retrofits Natural gas systems electrified
Promote Green Building	45,882 $MTCO_2e$	Net zero buildings
Improve Efficiency of Municipal Operations and Public Infrastructure	Supportive strategy	Electricity and natural gas use (total and per capita) Building retrofits Solar energy generation
Zero Waste		
Solid Waste Diversion	13,452 $MTCO_2e$	Solid waste generation Waste diversion rates Tonnage of recycling and organics diverted from the landfill
Green Purchasing	Supportive strategy	Post-consumer content paper products Green Seal certified cleaning products
Water Conservation and Efficiency		
Promote Water Conservation	1,955 $MTCO_2e$	Water use (total and per capita)
Promote Water Recycling and Greywater Use	339 $MTCO_2e$	Recycled water use (total)
Sustainable Land Use and Transportation		
Support Fuel Efficient and Alternative Fuel Vehicles	13,228 $MTCO_2e$	Electric vehicle and zero-emission vehicles (% of fleet) Charging stations installed
Improve Pedestrian and Bicycle Infrastructure	1,837 $MTCO_2e$	Miles of bike lanes Complete Street retrofits completed
Expand Public Transit Options and "Last Mile" Connectivity	Supportive strategy	Transit ridership rates
Support Transportation Demand Management	Supportive strategy	TDM program participations
Promote Smart Growth, TOD, and Complete Neighborhoods	Supportive strategy	Residential and employment density Intersection density

Desert Cities Energy Partnership

Indio is an active member of the Desert Cities Energy Partnership (DCEP), which pledges to collaborate on a regional GHG emissions inventory and promote energy efficiency and clean alternative energy. Through the DCEP, Indio has received assistance in identifying opportunities to improve energy efficiency both in municipal facilities and communitywide. Some recent GHG reduction programs include water saving initiatives; water efficiency measures including turf reductions and installation of smart irrigation control systems; and rebate and incentive programs offered by IID and SoCal Gas. The DCEP is managed by the Coachella Valley Association of Governments (CVAG).

Indio General Plan

The Conservation Element of the Indio General Plan outlines energy efficiency and demand response opportunities regarding energy and energy conservation. The City supports environmental and sustainability programs including Energy Star promotions and rebates; standard appliance efficiency improvements; solar installations; solid waste recycling and diversion programs; water saving initiatives; use of alternative fuel vehicles; and school outreach programs. Additionally, SoCal Gas provides rebates and incentives for customers to install high-efficiency water heaters, clothes washers, and furnaces, utilize low-flow showerheads, or insulate their attics and walls.

Indio Municipal Code

Similar to the CAP and the Indio General Plan, the City's Municipal Code also includes provisions that encourage the use of alternative transportation means that reduce the use of non-renewable energy and the use of energy efficient appliances and building design standards. The following list includes some of these provisions:

- Chapter 160, Transportation Demand Management, which is intended to protect the public health, welfare and safety by reducing air pollution caused by vehicle trips and vehicle miles traveled.
- Section 151.010, Adoption of California Building Code (CBC), indicates that the City adopted the CBC, as amended in Section 151.011, Amendments and Additions to the Building Code, in the Municipal Code.
- Section 151.017, Adoption of California Energy Code (CEC), indicates that the City of Indio adopted the 2019 CEC.
- Section 151.050, Adoption of California Green Building Code (CGBC), indicates that the City of Indio adopted the 2019 CGBC.

Regarding federal transportation regulations, the project site is located in a developed area. Access to and from the project site is proposed to occur on existing roads. These roads are already in place so the project would not interfere with, nor otherwise obstruct intermodal transportation plans or projects that may be proposed pursuant to the ISTEA because SCAG is not planning for intermodal facilities in the project area.

Regarding the State's Energy Plan and compliance with Title 24 CCR energy efficiency standards, the applicant is required to comply with the California Green Building Standard Code requirements for energy efficient buildings and appliances as well as utility energy efficiency programs implemented by IID and the Southern California Gas Company.

Regarding Pavley (AB 1493) regulations, an individual project does not have the ability to comply or conflict with these regulations because they are intended for agencies and their adoption of procedures and protocols for reporting and certifying GHG emission reductions from mobile sources.

Regarding the State's Renewable Energy Portfolio Standards, the project would be required to meet or exceed the energy standards established in the California Green Building Standards Code, Title 24, Part 11 (CALGreen). CALGreen Standards require that new buildings reduce water consumption, employ building commissioning to increase building system efficiencies, divert construction waste from landfills, and install low pollutant-emitting finish materials.

Additionally, the project is consistent with eh applicable strategies of the City of Indio's Climate Action Plan, as well as CARB's Scoping Plan. The project property will comply with all applicable federal, state, and local guidelines and regulations regarding energy efficient building design and standards. Therefore, the proposed project is not anticipated to conflict or obstruct a state or local plan for renewable energy or energy efficiency.

The project proposes transient lodging uses and will not have any long-term effects on an energy provider's future energy development or future energy conservation strategies. Less than significant impacts are expected.

Cumulative Impacts: None
Mitigation Measures: None

7. GEOLOGY AND SOILS -- Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
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 direct or indirect substantial risks to life or property?	☐	☒	☐	☐
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	☐	☐	☐	☒
f) Directly or indirectly destroy a unique paleontological resource of site or unique geologic feature?	☐	☒	☐	☐

Sources: Geotechnical Investigation, Sladden Engineering; Indio General Plan, 2019; Indio General Plan Environmental Impact Report, 2019.

a) i. **Less than Significant Impacts.** The City of Indio, similar to most of Southern California, is susceptible to earthquakes due to the various active faults that traverse the area. The Indio General Plan states that the San Andreas, San Jacinto, and Elsinore Faults are the three major faults in Riverside County. Hazards such as landslide, structural damage or destruction, liquefaction, and settlement are a potential result of rupture and strong seismic ground shaking in the City.

To reduce losses from surface fault rupture on a statewide basis, the Alquist-Priolo Earthquake Fault Zone Act was passed in 1972. This act was formed after the destructive San Fernando earthquake occurred a year prior. The Alquist-Priolo Earthquake Fault Zone Act is intended to ensure public safety by prohibiting the siting of most structures for human occupancy across traces of active faults that constitute a potential hazard to structures from surface fault or fault creep (California Department of Conservation). After consulting the most recent Alquist-Priolo Earthquake Zoning Map, issued by the State Geologist, it was determined that the closest Alquist-Priolo Earthquake Fault Zone to the project site is the San Andreas Fault, approximately 2.3 miles

northeast of the subject property. Conclusively, the project site is not located on an active fault or within the Alquist-Priolo Earthquake Fault Zone.

With the Alquist-Priolo Earthquake Fault Zone Map and the Indio General Plan EIR, it can be concluded that although seismically induced ground shaking is expected in the City, rupture from an earthquake fault is not anticipated on the project site. There are no known active faults near or at the project site, and the project is not located in an Alquist-Priolo Earthquake Fault Zone. Therefore, impacts are expected to be less than significant.

Cumulative Impacts: None
Mitigation Measures: None

ii. **Less than Significant Impact.** According to Figure 4.6-3, of the General Plan Update EIR, the San Andreas Fault is the closest fault to the City of Indio. The City of Indio is generally located in areas identified with moderate and high ground shaking risks. Hazards from surface rupture and ground shaking of these faults could expose people or structures to adverse effects.

The San Andreas Fault has historically produced moderate to severe earthquakes in the entire Southern California region, making seismic ground shaking a prominent geologic hazard to structural development throughout the City and region. The project site has likely been subject to past ground shaking. Seismic shaking is expected to continue producing ground accelerations during the design life of the project.

The project-specific Geotechnical Investigation, completed by Sladden Engineering, concluded that known faults are not mapped on or projecting towards the site, and no signs of active surface faulting were observed during their review of photographs of the site and site vicinity. Moreover, Sladden Engineering did not find sings of active surface fault rupture during their field investigation. Therefore, it was concluded that surface ground rupture at the project site is considered low. Although surface ground rupture is considered low at the project site, remedial grading and construction in accordance with the most current California Building Code (CBC) guidelines and seismic design coefficients will work to reduce impacts associated with seismic ground shaking to the greatest extent possible. Additionally, Policy SE-4.1, Development Plan Review, of the GPU EIR requires all new structures to be designed in accordance with the most recent CBC adopted by City Council, including the provisions regarding seismic loads, lateral forces, and grading and not built across the trace of an active fault. All grading, improvement and structural plans will be reviewed and approved by the City. The project will follow the seismic design parameters and recommendations found in the project-specific geotechnical investigation. Less than significant impacts are anticipated.

Cumulative Impacts: None
Mitigation Measures: None

iii. **Less than Significant Impact.** The Indio General Plan Update EIR states that liquefaction may occur when a saturated or partially saturated soil substantially loses strength and stiffness in response to an applied stress, usually earthquake shaking or other sudden changes in stress condition, causing it to behave like a liquid. Soil type and depth, grain size, relative density, groundwater level, and degree of saturation influence the likelihood of liquefaction. The majority of the City has a moderate level of liquefaction susceptibility. Areas with high liquefaction potential are mainly concentrated in the southeastern portion of the City. According to Figure 4.6-4, Liquefaction Hazard Map, of the GPU EIR, the project site is located in an area with moderate liquefaction susceptibility.

Sladden Engineering, in their project-specific Geotechnical Investigation, evaluated subsurface conditions at the site by drilling seven exploratory boreholes to depths between approximately 5 and 51.5 feet below ground surface (bgs). During their investigation, Sladden Engineering did not encounter groundwater to the maximum

explored depth of 51 feet bgs. Therefore, they concluded that risks associated with liquefaction, and the secondary effects seismically induced ground failure, is considered negligible. However, the project site shall adhere to the standard design requirements stated in the most recent California Building Code (CBC) and adhere to City policy SE-4.1 (referenced above), as well as the City's building standards in order to ensure the safety of the project against seismically induced hazards. Overall, impacts from seismically induced ground failure such as liquefaction is anticipated to be less than significant at the project site.

Cumulative Impacts: None
Mitigation Measures: None

iv. **No Impact.** The project site and much of the surrounding lands are predominantly level. There are no natural slopes and other geologic conditions that would render the area susceptible to unstable slopes and landslides. Based on the City of Indio GPU EIR, slopes with a gradient between 34 percent and 37 percent experience the greatest potential for sliding. Indio is located in land identified with less than 15 percent slopes, and accordingly, not identified with low, moderate, high, or existing landslide susceptibility. The project site is not located in areas near a slope, therefore impacts of landslides or rockfalls would not occur at the project. No impact.

Cumulative Impacts: None
Mitigation Measures: None

b) **Less than Significant Impact.** The soil types at the project site are identified by the United States Department of Agriculture (USDA) – Soil Survey for Coachella Valley Area, California, as Gilman fine sandy loam (GbA) and Indio very fine sandy loam (Is). Erosion potential for the GbA soil classification is categorized as "low." The soil type is described as generally "well drained." The erosion hazard potential for Is is categorized as "slight", with a "well drained" drainage type. According to the City of Indio General Plan (GP) Environmental Impact Report (EIR) Wind Erodibility Map (Figure 4-6.5), the project site is situated in an area with a wind erodibility rating of 4.

The proposed project will introduce permanent impervious and pervious ground cover improvements, including landscaping, which will prevent soil erosion or the loss of topsoil in any substantial manner. The proposed project will involve grading activities, which will be performed according to an engineered grading plan approved by the City. During construction, the project will comply with the requirements of the California General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities (General Permit), issued by the State Water Resources Control Board under the National Pollutant Discharge Elimination System (NPDES). Compliance with the General Permit requires the development of a Storm Water Pollution Prevention Plan (SWPPP), which will outline measures to minimize soil erosion and sedimentation. This plan is further discussed in the Hydrology and Water Quality section of this document. Moreover, a Fugitive Dust Control Plan will be implemented in accordance with the South Coast Air Quality Management District's regulations pertaining to soil erosion and fugitive dust (see discussion in Air Quality Section III). Less than significant impacts are anticipated.

Cumulative Impacts: None
Mitigation Measures: None

c) **Less than Significant Impact.** According to the City of Indio General Plan (GP) Environmental Impact Report (EIR), Southern California's topography is vulnerable to slope failures and landslides. Factors that determine slope failures include slope angle, geologic materials, climate conditions, earthquake shaking, and debris flow. The topography at the project site is relatively flat. Slopes do not occur in the vicinity of the project. Therefore, no impacts of landslides would occur at the project.

Per the GP EIR, areas of instability in the City includes the eastern and southern portions of Indio, where the presence of shallow groundwater and groundwater overdraft conditions make these areas susceptible to liquefaction and subsidence due to the shallow groundwater and groundwater overdraft conditions. Per the Indio GP EIR Liquefaction Hazard Map (Figure 4-6.4), the project is located in an area with moderate liquefaction susceptibility. Common industry practices for soils subject to liquefaction include over-excavation and compaction of soils during grading. Structural foundation plans can also address liquefaction. However, as stated in discussion a) iii, groundwater was not encountered to the maximum explored depth of 51 feet bgs, and liquefaction and the secondary effect of liquefaction (such as lateral spreading) is less than significant at the project site.

According to the Geotechnical Investigation, land subsidence can occur in valleys where aquifer systems have been subjected to extensive groundwater pumping, such that groundwater pumping exceeds groundwater recharge. Generally, pore water reduction can result in a rearrangement of skeletal grans and could result in elastic (recoverable) or inelastic (unrecoverable) deformation of an aquifer system. Locally, no fissures or other surficial evidence of subsidence were observed at or near the subject site. Therefore, less than significant impacts to subsidence is anticipated at the project site.

Per the GP EIR all development would be required to comply with applicable state laws and local regulations pertaining to geologic instability (per GP policy SE-4.2) as well as adhere to the grading and other recommendations to minimize impacts associated with unstable soils. All grading, improvement and structural plans will be reviewed and approved by the City. Therefore, less than significant impacts are anticipated to result from project implementation.

Cumulative Impacts: None
Mitigation Measures: None

d) **Less than Significant Impact with Mitigation Incorporated.** Expansive soils cause structural damage, cracked driveways and sidewalks, heaving of roads and highway structures, and disruption of pipelines and other utilities. According to the Indio GP EIR, soil types with potential to result in shrinking and swelling are generally not located within the City boundaries, however, soils with clay are present in the eastern portion of the City planning area. Sladden Engineering's investigation of the project site determined that the project site is currently underlain by clayey sand (SC), sandy clay (CL), silty sand (SM) and sand (SP). Based on the results of Sladden Engineering's Geotechnical Investigation, the materials underlaying the site are considered to have a "medium" expansion potential.

According to the Geotechnical Investigation, site clearing shall occur onsite to remove existing vegetation, root systems, debris, and other irreducible matter. In order to provide firm and uniform foundation bearing conditions, Sladden Engineering recommends over-excavation and recompaction throughout the proposed new building areas. The project's removal of organic material and irreducible matter, as well as the over-excavation and recompaction of the site will remove expansive soils at the project site.

All earthwork including excavation, backfill, and preparation of the primary foundation and/or slab bearing soil should be performed in accordance with the geotechnical recommendations presented in Sladden Engineering's project-specific report. Additional measures outlined as policies in the GP EIR include Policy SE-4.1, Development Plan Review, which requires all new structures to be designed in accordance with the most recent CBC adopted by City Council. Less than significant impacts are anticipated relative to expansive soils.

Cumulative Impacts: None
Mitigation Measures:

GEO-1: All earthwork including excavation, backfill, and preparation of the primary foundation and/or slab bearing soil should be performed in accordance with the geotechnical recommendations presented in Sladden Engineering's project-specific Geotechnical Investigation.

e) **No Impact.** Sewer service is provided in the vicinity by the Valley Sanitary District. The project will connect to the public sewer system and no septic tanks or alternative wastewater disposal systems are proposed. No impacts are anticipated.

Cumulative Impacts: None
Mitigation Measures: None

f) **Less than Significant Impact**. Paleontological resources provide evidence of past life forms and their biota, which is valued for the information they yield about the history of earth and its past ecological settings. The Coachella Valley is the northwest extension of the Salton Trough, a major geological feature in the region spanning from the Banning pass south to the Gulf of California in Mexico, and contains deposits that may support paleontological resources. The Salton Trough was an extension of the Gulf of California during the late Miocene and early Pliocene eras. During the Holocene era the Salton Trough was periodically inundated by flows of the Colorado River, which periodically found its way into the Salton Trough. During this era, the trough, which had no outlet, contained the large freshwater lake, Lake Cahuilla with a shoreline that reached 42 feet above sea level. Based on the Sensitive Paleontological Resources Map included as Figure 4.5-3 in the GP EIR, the City of Indio is almost entirely comprised of geologic formations with high potential for paleontological resources.

The northern half of the project is currently developed with commercial buildings, whereas the southern half is undeveloped, however, previous disturbance on the southern portion includes vehicle tracks, and the storage of industrial materials (i.e., cars, car parts, etc.) onsite. The site is not recognized as having a unique geologic feature. Additionally, the project property lies in an urbanized context within the City, surrounded by residential uses, office buildings, and commercial buildings.

Although the project site is disturbed and within an urbanized context within the City of Indio, Figure 4.5-3 indicates that the project site is located in area with high potential for paleontological resources. Therefore, construction activities, such as grading and excavation, may result in the accidental destruction or disturbance of paleontological resources. The GPU EIR established two policies (Policy CE-8.1 and Policy CE-8.4) to reduce these impacts. Policy CE-8.1 ensures adequate site plan review and implementation of mitigation measures for the development of sites with the potential to contain paleontological resources during excavation and construction activities. Policy CE-8.4 requires monitoring on sites where grading has the potential to impact subsurface cultural and paleontological resources during excavation and construction activities. This is implemented by Mitigation Measure GEO-2, which requires a qualified paleontologist to be retained during initial grading activities. Following implementation of the Mitigation Measure, less than significant impacts are anticipated.

Cumulative Impacts: None
Mitigation Measures:

GEO-2: A qualified paleontologist shall be retained and present during the first days of grading. Once the paleontologist has had a chance to assess the sediments and paleontological potential of the project area, he/she may make a recommendation to reduce the monitoring effort, as appropriate, or continue with full time monitoring. This decision shall be communicated along with the rationalization to the City for their records.

8. **GREENHOUSE GAS EMISSIONS** – Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
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?	☐	☐	☒	☐

Sources: *Final 2016 Air Quality Management Plan* (AQMP), by SCAQMD, March 2017; *Final 2003 Coachella Valley PM10 State Implementation Plan* (CVSIP), by SCAQMD, August 2003; *Analysis of the Coachella Valley PM10 Redesignation Request and Maintenance Plan*, by the California Air Resources Board, February 2010; California Emissions Estimator Model (CalEEMod), Version 2020.4.0. California Greenhouse Gas Emissions for 2000 to 2019, Trends of Emissions and Other Indicators, 2021 Edition, California Air Resources Board; Release No. 18-37 & 19-35, California Air Resources Board Press Release, July 2018 and August 2019.

Summary of Local and Statewide Greenhouse Gas Regulations and Trends:

Greenhouse gases (GHG) are a group of gases that trap solar energy in the Earth's atmosphere, preventing it from becoming too cold and uninhabitable. Common greenhouse gases in the Earth's atmosphere include water vapor, carbon dioxide (CO2), methane (CH4), nitrous oxide (N2O), ozone, and chlorofluorocarbons to a lesser extent. Carbon dioxide is the main GHG thought to contribute to climate change. Carbon dioxide reflects solar radiation back to Earth, thereby trapping solar energy and heat within the lower atmosphere. Human activities (such as burning carbon-based fossil fuels) create water vapor and CO2 as byproducts, thereby impacting the levels of GHG in the atmosphere. Carbon dioxide equivalent (CO2e) is a metric used to compare emissions of various greenhouse gases. It is the mass of carbon dioxide that would produce the same estimated radiative forcing as a given mass of another greenhouse gas.

To address the long-term adverse impacts associated with global climate change, California's Global Warming Solutions Act of 2006 (AB 32) requires California Air Resource Board (CARB) to reduce statewide emissions of greenhouse gases to 1990 levels by 2020. In 2016, Governor Jerry Brown signed Senate Bill 32 (SB32) that requires California to reduce GHG emissions to 40 percent below 1990 levels by 2030. With the passage of the California Global Warming Solutions Act of 2006 (Assembly Bill 32) in California, environmental documents for projects pursuant to CEQA are required to analyze greenhouse gases and assess the potential significance and impacts of GHG emissions.

California's annual statewide GHG emission inventory is an important tool for determining historical emission trends and tracking California's progress in reducing GHGs. In concert with data collected through various California Global Warming Solutions Act (AB 32) programs, the GHG inventory has been considered critical in demonstrating the state's progress in achieving the statewide GHG target. The inventory provides estimates of anthropogenic GHG emissions within California. CARB is responsible for maintaining and updating California's GHG Inventory.

On July 11, 2018, CARB announced in a press release (No. 18-37) that greenhouse gas pollution in California fell below 1990 levels for the first time since emissions peaked in 2004, an achievement roughly equal to taking 12 million cars off the road or saving 6 billion gallons of gasoline a year. Moreover, according to the CARB report on California Greenhouse Gas Emissions for 2000 to 2017 (published in 2019), which tracks the trends of GHG emissions, California's GHG emissions have followed a declining trend between 2007 and 2017. In 2017, emissions from GHG emitting activities statewide were 424 million metric tons of CO2 equivalent (MMTCO2e), 5 MMTCO2e lower than 2016 levels and 7 MMTCO2e below the 2020 GHG Limit of 431 MMTCO2e. The largest

reductions are attributed to the electricity sector, which continues to see decreases as a result of the state's climate policies. The transportation sector remains the largest source of GHG emissions in the state, but saw a 1 percent increase in emissions in 2017, the lowest growth rate over the previous 4 years.

On August 12, 2019, California Governor Gavin Newsom announced in a press release (No. 19-35) that GHG emissions in California continued to fall ahead of schedule in 2017 as the state's economy grew ahead of the national average, according to the California Air Resources Board's latest state inventory of climate-changing emissions. The data also shows that for the first time since California started to track GHG emissions, the state power grid used more energy from zero-GHG sources like solar and wind power than from electrical generation powered by fossil fuels. The press release also included the following highlights:

Electricity: Emissions from electricity generation made up about 15 percent of 2017 statewide greenhouse gas emissions. In 2017, those emissions fell nine percent from 2016, the largest decline of any economic sector. A large increase in zero-emission energy resources drove the reduction. Those clean sources powered 52 percent of all California's electricity consumed in 2017.

Transportation: Vehicle tailpipe emissions accounted for 37 percent of California's 2017 GHG emissions. Those emissions rose but showed signs of leveling off. The 2017 increase was 0.7 percent, down from two percent the preceding year. Most of the greenhouse gas emissions increase came from passenger vehicles.

Industry: Industrial emissions over multiple sectors showed a slight reduction or remained flat. California's industrial sectors generated 21 percent of state GHGs in 2017. Oil & gas refineries and hydrogen production were responsible for one-third of those emissions. The rest came mostly from oil & gas extraction, cement plants, glass manufacturers and large food processors.

The CARB report on California Greenhouse Gas Emissions for 2000 to 2019 (2021 Edition) indicates that in 2019, emissions from GHG emitting activities statewide were 418.1 million metric tons of carbon dioxide equivalent (MMTCO2e), 7.1 MMTCO2e lower than 2018 levels and almost 13 MMTCO2e below the 2020 GHG Limit of 431 MMTCO2e. The 2021 report also indicates that transportation emissions have continued to decline in 2019 as they had done in 2018, with even more substantial reductions due to a significant increase in renewable diesel (up 61 percent from 2018), making diesel fuel bio-components (biodiesel and renewable diesel) 27 percent of total on-road diesel sold in California. Total electric power emissions decreased by almost 7 percent in 2019, due to a continuing increase in renewable energy, including a 46 percent increase in available hydropower in 2019.

South Coast Air Quality Management District: On December 5, 2008, the SCAQMD Governing Board adopted the staff proposal for an interim GHG significance threshold for projects where the SCAQMD is lead agency. The board letter, resolution, interim GHG significance threshold, draft guidance document and attachments can be found below or under the Board Agenda Item 31 on the December 5, 2008, Governing Board meeting agenda. Based on this source, the relevant threshold for the proposed project is 3,000 metric tons of carbon dioxide equivalent (MTCO2e) per year.

City of Indio Climate Action Plan: The City's Climate Action Plan (CAP) was completed on September 18, 2019 to serve as the City's GHG reduction strategy and to establish the City's goals for addressing the issue of climate change with consideration to the statewide reduction goal outlined in Assembly Bill 32 and Senate Bill 32. The CAP takes into account a strategy involving clean energy, low-carbon buildings, zero waste, water conservation, and sustainable land use and transportation elements toward GHG reductions.

a) **Less than Significant Impact.** CalEEMod Version 2020.4.0 was used to quantify GHG emissions associated with the project involving an industrial park building area of 92,427 square feet and parking lot area of 1.20 acres (stalls, driveways and hardscape). Construction-related GHG emissions were amortized over a 30-year

period and added to the project's annual operational GHG emissions. The operational GHG emissions can be attributed to area sources, mobile sources, solid wastes and water supply, treatment and distribution of the proposed operations. The currently applicable GHG thresholds for local lead agency consideration are referenced from the SCAQMD Working Group Threshold supporting documentation, which establishes an interim tiered approach. Under this guidance, a screening threshold of 3,000 metric tons of carbon dioxide equivalent (MTCO2e) per year is appliable to the project.

Table VIII-1 Total Project Greenhouse Gas Emissions

Emission Sources	**Emissions (metric tons per year)**
	Total MTCO2E
Annual Construction Emissions Amortized Over 30 Years	12.34
Area, Energy, Mobile Sources, Waste, and Water Usage	956.84
Total CO2E (All Sources)	969.18
SCAQMD Threshold for Industrial Projects	3,000
Threshold Exceeded?	**NO**

As shown in Table VIII-1, project implementation is expected to generate approximately 969.18 MTCO2e per year from conventional construction, area, energy, mobile sources, waste, and water usage sources. This quantity would occur considerably below the applicable threshold of 3,000 MTCO2e per year. As such, the project-wide emission levels will be compliant with the SCAQMD threshold.

Having been evaluated against the regionally accepted thresholds, which are part of the State's regulations aimed at addressing climate change, the project is not expected to interfere with the plans, policies, or regulations adopted for the purpose of reducing the emissions of greenhouse gases. Less than significant impacts are anticipated.

Cumulative Impacts: None
Mitigation Measures: None

b) **Less than Significant Impact.** As previously mentioned in discussion a), under Assembly Bill 32 passed in 2006, California must reduce its emissions to 1990 levels (431 million metric tons) by 2020. Senate Bill 32, signed in 2016, requires the state to go even further than AB 32 and cut emissions 40 percent below 1990 levels by 2030—the most ambitious carbon goal in North America. California's primary programs for reducing greenhouse gases to 1990 levels by 2020 are the Renewables Portfolio Standard, the Advanced Clean Cars Program, the Low Carbon Fuel Standard and the Cap-and-Trade Program. Additional programs address a variety of greenhouse gas sources. These include the Short-Lived Climate Pollutants Strategy, the Sustainable Communities Strategy and the Sustainable Freight Action Plan. The 2030 Scoping Plan, adopted by CARB, lays out how these initiatives work together to reduce greenhouse gases to achieve California's 2030 target of 260 million metric tons and also to reduce smog-causing pollutants. This target will require California to more than double the rate at which it has been cutting climate-changing gases. Future reductions will occur against a backdrop of natural sources of GHGs which are increasingly variable because of the climate change California is already witnessing. The SCAQMD adopted the interim GHG significance threshold for stationary/industrial sources on December 5, 2008 which applies to Projects where the SCAQMD is the lead agency.

As announced in multiple press releases by the California Governor and demonstrated in the most recent CARB report on emissions trends, California statewide GHG emissions dropped below the 2020 GHG Limit in 2016 and have remained below the 2020 GHG Limit since then, generally dropping since 2004. In 2019, emissions from GHG emitting activities statewide were 418.1 million metric tons of carbon dioxide equivalent (MMTCO2e), 7.1 MMTCO2e lower than 2018 levels and almost 13 MMTCO2e below the 2020 GHG Limit of 431 MMTCO2e. The 2021 report also indicates that transportation emissions have continued to decline in 2019 as they had done in 2018, with even more substantial reductions due to a significant increase in renewable diesel (up 61 percent from 2018), making diesel fuel bio-components (biodiesel and renewable diesel) 27 percent of total on-road diesel sold in California. Total electric power emissions decreased by almost 7 percent in 2019, due to a continuing increase in renewable energy, including a 46 percent increase in available hydropower in 2019.

The proposed self-storage project is expected to result in construction and operational GHG emissions totaling 969.18 MTCO2e per year in comparison to the threshold set at 3,000 MTCO2e per year. As a result, the project is not expected to conflict with any applicable plan, policy or regulation for the purpose of reducing GHG emissions. This includes the Indio Sustainability Plan, which works in accordance with the AB 32 framework and strategies. Less than significant impacts are anticipated.

Cumulative Impacts: None
Mitigation Measures: None

9. **HAZARDS AND HAZARDOUS MATERIALS** – Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☒	☐
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☒	☐
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☐	☒
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	☐	☐	☒	☐
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☐	☒

Sources: Indio General Plan, 2019; Indio General Plan Environmental Impact Report, 2019; EnviroStor, California Department of Toxic Substances Control; GeoTracker, State of California Water Resources Control Board; Enforcement and Compliance History Online (ECHO), EPA.

a) **Less than Significant Impact.** The project site is located on approximately 5.14 acres of disturbed land south of Indio Boulevard. The project proposes the development of five storage buildings and an office building on approximately 3.58 acres of the site. The proposed office building will be 1,000 square feet, and the proposed storage buildings will be 91,696 square feet, for a total of 92,696 square feet of proposed building. The project also proposes access roads, hardscape, parking areas, and landscaped areas. The proposed project is not expected to involve the use of any hazardous materials with the operation of the storage facility.

The Public Health and Safety Element of the Indio General Plan references the Code of Federal Regulations (CFR Title 40, Part 261), which defines hazardous materials on the basis of ignitability, reactivity, corrosivity, and/or toxicity. The State of California defines hazardous materials as substances that are toxic, ignitable or flammable, reactive and/or corrosive, which have the capacity of causing harm or a health hazard during normal exposure or an accidental release or mishap. Hazardous wastes require special handling and disposal to reduce their potential to damage public health and the environment. Individual circumstances, including the substance type and quantity used, and the nature of the activities and operations, affect the likely occurrence and severity of consequences from a hazardous situation. Existing federal, state and local laws regulate the use and management of hazardous or potentially hazardous materials.

Construction of the proposed project would involve the temporary management and use of potentially hazardous substances for construction and related equipment. Some of these materials would be transported to the site periodically by vehicle and would be stored temporarily during construction. When handled properly by trained individuals per the manufacturer's instructions and industry standards, such materials pose a reduced risk. The proper management of potentially hazardous materials will be regulated in part by the Best Management Practices (BMPs) and measures of a required Storm Water Pollution Prevention Plan (SWPPP) for the project. The most pertinent BMPs, identified by the California Stormwater Quality Association (CASQA), are Material Delivery and Storage (WM-1); Material Use (WM-2); and Spill Prevention and Control (WM-4). These measures outline the required steps for preventing impacts due to hazardous materials to humans and the environment during construction. With such standard measures in place, less than significant impacts are anticipated during construction.

Commercial storage facilities (available for rent to the public) do not typically involve the routine transport, use or disposal of hazardous materials in quantities or a manner that would pose a threat to the project and surroundings. Potentially hazardous materials are not anticipated to be present in sufficient quantities to pose a significant hazard to public health and safety or the environment. Less than significant impacts are anticipated.

Cumulative Impacts: None
Mitigation Measures: None

b) **Less than Significant Impact.** As noted previously, storage facilities for rent by the public do not typically store, use, or handle hazardous materials in large quantities. Therefore, accidental conditions involving the release of hazardous materials are unlikely. The project is required to follow industry regulations related to use and storage of maintenance-related chemicals. Less than significant impacts are expected to result from project implementation.

Cumulative Impacts: None
Mitigation Measures: None

c) **Less than Significant Impact.** The project is located approximately 0.20 miles northwest of the closest school, Carrillo Ranch Elementary School. As mentioned throughout this document, the project site would develop a storage facility. The project will operate in a fully secured setting and surrounded with perimeter fencing. The nature of this project does not involve hazardous substances other than common maintenance cleaners and solvents. Materials stored on site will be stored and applied according to manufacturer's instructions to mitigate the potential for incidental release of hazardous materials, explosive reactions, injury and contamination. Moreover, all hazardous materials associated with the construction and operation of a storage facility will be subject to federal, state, and local regulations. To further minimize any potential public exposure to accidental risks, proper construction and safety measures will be implemented and temporary impacts during construction will be further mitigated by standard operational procedures and protocols as well as Best Management Practices (BMPs). Less than significant impacts are expected.

Cumulative Impacts: None
Mitigation Measures: None

d) **No Impacts.** Record searches on the project property were performed within multiple database platforms compiled pursuant to Government Code 65962.5 and its subsections. The resources consulted included GeoTracker, EnviroStor and the EPA Enforcement and Compliance History Online (ECHO).

GeoTracker is a database maintained by the State of California Water Resources Control Board that provides online access to environmental data. It serves as the management system for tracking regulatory data on sites

that can potentially impact groundwater, particularly those requiring groundwater cleanup and permitted facilities, such as operating underground storage tanks and land disposal sites.

EnviroStor is a database maintained by the State of California Department of Toxic Substances Control (DTSC). The EnviroStor database identifies sites with known contamination or sites for which there may be reasons to investigate further. It includes the identification of formerly contaminated properties that have been released for reuse; properties where environmental deed restrictions have been recorded to prevent inappropriate land uses; and risk characterization information that is used to assess potential impacts to public health and the environment at contaminated sites.

Moreover, the ECHO database focuses on inspection, violation, and enforcement data for the Clean Air Act (CAA), Clean Water Act (CWA) and Resource Conservation and Recovery Act (RCRA) and also includes Safe Drinking Water Act (SDWA) and Toxics Release Inventory (TRI) data.

In March of 2022, a search was performed on all three database platforms. The search results did not identify any records or sites in connection with the project property. The GeoTracker and EnviroStor database results did not identify any Leaking Underground Storage Tank (LUST) Cleanup Sites, or Permitted Underground Storage Tanks on the project property.

The GeoTracker search uncovered three registered facilities within a half-mile radius of the project site. The closest site was Circle K #538, at 43955 Clinton Street. This site is registered as a LUST Cleanup Site; however, the status of this facility is Completed Case Closed as of December 2002. The second registered site was Tarmac (Empire Sales) Co. at 81510 Industrial Place. This site was also listed as a LUST Cleanup Site, and like Circle K, has a status of Completed Case Closed (August 1997). The third site is Apple Market #5, at 80631 Indio Boulevard. This site was also listed as a LUST Cleanup Site, with a status of Completed Case Closed (February 2008). Each site is located approximately 0.50 miles from the project property. No impacts are anticipated due to the facilities' distance from the project and status as Completed Case Closed.

The EnviroStor database listed one registered site within a half-mile radius of the project. The registered site is indicated as a school investigation site for Madison Street Elementary School No. 227, located east of Madison Street and north of Fred Waring Drive. Based on public documents within the EnviroStor database, the elementary school was proposed at this site. In a Preliminary Endangerment Assessment (PEA) prepared by Earth Systems Southwest in February 2004 for the school investigation, it was determined that no actual or potential release of hazardous material nor the presence of naturally occurring hazardous material which would pose a threat to human health or the environment under any land use was indicated at the site. In March 2004, the site required no further action. Due to the status of the site, no impacts are anticipated.

ECHO listed eleven facilities within a half-mile (2,640-foot) radius of the project. The registered facilities are listed below.

- Max Built Autoworks, located immediately west of the project site at 43164 Madison Street. This site is registered by the RCRA as an "active other" facility. No violations.
- Auto Mall Collision, Inc. at 43010 Madison Street, and approximately 100 feet west of the project. This site is registered by the RCRA as an "active other" facility. No violations.
- Advantage West, at 42936 Madison Street, Suite A, approximately 250 feet west of the project. This site is registered by the RCRA as an "active other" facility. No violations.
- FC Landscape, Inc., at 43216 Madison Street, approximately 280 feet southwest of the project. This site is registered by the RCRA as an "active other" facility. No violations.
- Indio Water Authority Well AA, at 43602 Madison Street, approximately 700 feet southwest of the project. This site is registered by the RCRA as an "active large quantity generator" (LQG) facility. This site is considered a significant noncomplier.

- Dynamic Collision Center of Coachella Valley, located at 42900 Madison Street, approximately 0.17 miles west of the project. This site is registered by the RCRA as an "active other" facility. No violations.
- Coachella Valley Mosquito and Vector Control District, 43420 Trader Place, 0.30 miles east of the project. This site is registered by the RCRA as an "active other" facility. No violations.
- Mario Hernandez, 81427 Forest Drive, 0.37 miles southeast of the project. This site is registered by the RCRA as an "active other" facility. No violations.
- Circle K Stores Inc. 2700538, 43955 Clinton Street, 0.42 miles southeast of the project. Is registered by the RCRA as an "active other" facility. No violations.
- Circle K Store #538, 43955 Clinton Street, 0.42 miles southeast of the project. This site is registered by the RCRA as an "active other" facility. No violations.
- O'Connell Landscape Maintenance, 43549 Wheel Road, 0.50 miles east of the project. This site is registered by the RCRA as an "active other" facility. No violations.

The project site was not listed within the ECHO database. Most of the registered sites currently do not have violations, excluding Indio Water Authority Well AA, approximately 700 feet southwest of the project. Well AA is a significant noncomplier, however, the site is not located adjacent to or within the project site, additionally it is located down gradient of the project site and not likely to impact the site. Additionally, the most current public reports (2019) indicate that the hazardous inorganic liquid was removed from the site. Therefore, less than significant impacts are expected.

Cumulative Impacts: None
Mitigation Measures: None

e) **Less than Significant Impact.** The Jacqueline Cochran Regional Airport is located approximately 8.36 miles southeast of the project. The Palm Springs International Airport is located approximately 15.10 miles northwest of the project site. The Bermuda Dunes Airport, a private airstrip, is located approximately 1.14 miles northwest of the project. As a result, the project is located within Compatibility Zone C of the Bermuda Dunes Airport influence and planning area. The project, which proposes a storage facility, is an acceptable use within Zone C. Additionally, the project location sits within the Airport's 55 CNEL noise contour. However, the project does not propose incompatible uses (such as residential properties, hospitals, nursing homes, schools, etc.). Although flights approaching and departing the airports may fly over the project site with an intermittent frequency, less than significant impacts are anticipated.

Cumulative Impacts: None
Mitigation Measures: None

f) **Less than Significant Impact.** Access to the project site is currently provided by Indio Boulevard, north of the project site. Development of the proposed project would not result in changes to the City's circulation patterns or emergency access routes, as there are no established emergency evacuation routes in the City of Indio, per the Indio GP EIR. The proposed project site design will be reviewed by the Indio Fire Department for compliance with project-specific emergency access and similar requirements as a routine aspect of Indio's design review process prior to issuance of building permits. This ensures that the project would not preclude or interfere with emergency access or fail to comply with fire department standards. Therefore, impacts would be less than significant.

Cumulative Impacts: None
Mitigation Measures: None

g) **No Impact.** Large areas of Southern California are susceptible to wildfires all year round due to the region's weather, topography and vegetation conditions. The Coachella Valley's hot dry summer and autumn weather

is ideal to generate the dry vegetation that fuels most wildfires. The California Board of Forestry (CDF) ranks fire hazard of wildland areas of the State using four main criteria: fuels, weather, assets at risk, and level of service. The project site is located on relatively flat topography, in a developed context within the City of Indio. The project site and its surroundings are located outside of the Very High Fire Hazard Severity Zone (FHSZ) for Local Responsibility Area and outside of the Very High/High/Moderate FHSZ for State and Federal Responsibility Areas. The project will include the on-site fire protection facilities necessary to satisfy the local Fire Department requirements. No impacts related to wildland fire are expected.

Cumulative Impacts: None
Mitigation Measures: None

10. **HYDROLOGY AND WATER QUALITY** -- Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
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 result in substantial erosion or siltation on- or off-site?				
i) result in substantial erosion or siltation on- or off-site;	☐	☐	☒	☐
ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;	☐	☐	☒	☐
iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	☐	☐	☒	☐
iv) impede or redirect flood flows?	☐	☐	☒	☐
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☒	☐
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☒	☐

Sources: Flood Insurance Rate Map # 06065C2234G, Federal Emergency Management Agency (FEMA), Effective August 28, 2008; Water Quality Control Plan for the Colorado River Basin Region, January 2019; 2020 Coachella Valley Regional Urban Water Management Plan, June 2021; *Project Specific Water Quality Management Plan (WQMP) for Indio Self Storage*, January, 2022

Summary of Regulatory Framework Relevant to Hydrology and Water Quality:

Hydrology refers to the occurrence, distribution, and movement of surface water, including water found in rivers and stormwater drainage systems. Stormwater particularly refers to the surface runoff and drainage resulting from rain events. Stormwater runoff and surface drainage patterns are determined by the soil conditions, topography, and associated gradients of the land. Surface water quality refers to selected physical, chemical, or biological characteristics found in stormwater in relation to existing standards. Groundwater is the water found underground in the voids in soil, sand, and rock. It is stored in and moves slowly through aquifers. Groundwater supplies are naturally replenished, or recharged, by precipitation that seeps into the land's surface and by replenishment efforts made by local water agencies.

The Clean Water Act (CWA) of 1972 was enacted to restore and maintain the chemical, physical, and biological integrity of the nation's waters by regulating the discharge of pollutants to waters of the U.S. from point sources. The National Pollutant Discharge Elimination System (NPDES) was enacted as a program under the CWA to regulate non-point source discharges from urban land runoff and other diffused sources that were also found to contribute to runoff pollution. Under CWA, the Environmental Protection Agency (EPA) delegated the NPDES program responsibility to various state, tribal, and territorial governments, enabling them to perform many of the

permitting, administrative, and enforcement aspects of the program. California is a delegated NPDES state and has authority to administer the NPDES program within its limits.

The Porter-Cologne Water Quality Control Act (California Water Code section 13000 et seq.) is the principal law governing water quality regulation for surface waters in California, thus effectuating the delegated provisions of the federal CWA and its NPDES program. It has set forth a comprehensive program to protect water quality and the beneficial uses applicable to surface waters, wetlands, and ground water and to point and nonpoint sources of pollution. The Porter-Cologne Act establishes that, as a matter of policy, all the waters of the State shall be protected; all activities and factors affecting the quality of water shall be regulated to attain the highest water quality within reason; and that the state must be prepared to exercise its full power and jurisdiction to protect the quality of water in the state from degradation. The Porter-Cologne Act established the State Water Resources Control Board (SWRCB) and nine California Regional Water Quality Control Boards (RWQCBs), including Region 7, Colorado River Basin Regional Water Quality Control Board, which has jurisdiction in the City of Indio and project site.

Under this framework, the Colorado River Basin Water Quality Control Plan (Basin Plan) serves as the guiding document prepared, adopted, and maintained to identify the existing and potential beneficial uses of waters of the State and establish water quality objectives to protect these uses. It is worth noting that as defined in Section 13374 of the California Water Code (CWC), the term "Waste Discharge Requirements" (WDRs) is equivalent of the term "permits" and is therefore attained through a regulatory compliance process. Compliance with WDRs is achieved through the appropriate permit registration process under the applicable National Pollutant Discharge Elimination System (NPDES) programs described in this section.

At the regional level, the project is located within the Whitewater River Watershed, which is an arid desert region encompassing approximately 1,645 square miles. Within this watershed, an area of approximately 367 square miles (22 percent) encompassing most of the existing development in the Coachella Valley region, is regulated under the established Whitewater River Region Municipal Separate Storm Sewer System Permit (MS4 Permit). The Riverside County Flood Control and Water Conservation District (RCFC&WCD), Mission Springs Water District, and the incorporated Coachella Valley cities, including Indio have joint permittee responsibility for coordinating the regional MS4 Permit compliance programs and other activities aimed at reducing potential pollutants in urban runoff from land development construction, municipal, commercial, and industrial areas to the maximum extent possible. These public entities are generally in charge of stormwater management within their jurisdiction.

At the City level, hydrology, water quality, and stormwater standards applicable to land development and facility operations are principally covered in Chapter 55 of the City's Code of Ordinances (City of Indio Storm Water Management and Discharge Control). The purpose of this chapter is in part to ensure the regulation of non-storm water discharges to the municipal storm drain; controlling the discharge to municipal storm drains from spills dumping or disposal of materials other than storm water; and reducing pollutants in storm water discharged to the maximum extent practicable. This chapter also aims to protect and enhance the quality of city watercourses, water bodies, ground water and wetlands in a manner pursuant to and consistent with the Federal Clean Water Act and the Porter-Cologne Water Quality Control Act.

Moreover, Section 162.140 of the Indio Code of Ordinances requires that properties of one acre or greater in size shall be designed to retain the 100-year, 24-hour, duration storm on site. Such properties shall retain this duration storm on site or provide a drainage system to convey the drainage to an acceptable retention site as determined by the Director of Public Works. The City's stormwater regulations are designed to align with the MS4, NPDES, and CWA programs respectively. The City's engineering review process ensures that improvement plans are formally checked for compliance with the City's requirements pertaining to grading, hydrology, and stormwater management prior to issuance of grading permits.

a) **Less than Significant Impact.** The project site involves approximately 3.58 acres, of which the southern portion is undeveloped while the northern portion includes a paved area and accessory storage structures as part

of the Commercial Lighting Industries, Inc. ("CLI") operations. The project site will accommodate new development involving a self-storage facility with one office structure, five storage buildings ("A" through "E"), and parking facilities with driveway access from Indio Boulevard. The existing accessory structures, facilities, and paving within the project limits will be duly vacated and demolished to allow for the new development configuration. The existing primary building and front parking lot area occupied by CLI is not part of the project limits and will remain adjacent to the project site.

During construction and life of the project (operation) the proposed development will be required to comply with CWA, NPDES, state, and local regulations designed to prevent violations or impacts to surface water quality standards and waste discharge requirements pertinent to surface or ground water quality. As discussed below, this is achieved through the preparation of applicable compliance plans and permit registration documents that must obtain agency approval prior to issuance of a grading permit, ground disturbance, and operation. The project scope does not seek any permitting concessions that would vary from the established requirements for new development.

During the period of construction, the project proponent must comply with the State's most current NPDES Construction General Permit (CGP), Order No. 2009-0009-DWQ, as amended by 2010-0014-DWQ and 2012-006-DWQ. Compliance with the CGP requires the preparation of a Notice of Intent (NOI) and a project-specific Storm Water Pollution Prevention Plan (SWPPP), designed to prevent potential adverse impacts to surface water quality, including erosion and siltation, during the period of construction. The NOI and SWPPP must be submitted to the State Water Resources Control Board (SWRCB) for approval and permit coverage. The SWPPP is a site-specific compliance plan required to identify a strategy of storm water Best Management Practices (BMPs) in accordance with Section XIV (SWPPP Requirements) of the CGP. Storm water BMPs refer to a schedule of activities, prohibitions, practices, maintenance procedures, and other management practices to avoid, eliminate, or reduce the pollution of the receiving waters, primarily focused on preventing erosion, siltation, illicit discharge, and contamination. The SWPPP will include such measures as erosion control, sediment control, storm drain inlet protection, proper waste management and pollution prevention. The SWPPP must be prepared concurrently with final engineering design and undergo City review in addition to the State permit process. The City's review process ensures that all responsible parties and compliance plan elements are properly demonstrated. Compliance of this plan during construction will be regulated and enforced as part of the local agency site inspection protocols.

During the life of the project (operation), the project proponent is required to implement an approved Water Quality Management Plan (WQMP) to comply with the most current standards of the *Whitewater River Region Water Quality Management Plan for Urban Runoff* and the *Whitewater River Watershed MS4 Permit*. A Preliminary WQMP has been prepared for this project in order to meet the City's engineering approval requirements. The WQMP takes into account the existing and proposed drainage conditions based on the project specific hydrology report and improvement plans (precise grading).

The proposed development is divided into two drainage areas ("A" and "B") for hydrology and stormwater management purposes. Drainage Area "A" covers the northern 2.183 acres with a predominant impervious coverage consisting of structures, paving, and hardscape. Drainage Area "B" covers the southern 1.394 acres, also with a mostly impervious cover. The project involves a private storm drain system with respective underground retention facilities, sufficiently sized to receive the stormwater runoff volume from each drainage area for controlling 100-year storm event and the WQMP MS4 requirements. The preliminary hydrology report and WQMP demonstrate that each retention system is adequately sized to accept the on-site tributary runoff, therefore meeting the City's local retention requirements and the regionally based MS4 requirements.

As a result, project runoff will be completely contained within the project proponent's facilities and will not result in discharge capable of resulting in downstream hydrologic modifications or a contribution of urban runoff pollutants that would affect surface water quality. As a requirement, all elements of the WQMP

implementation, including maintenance, must be documented during the life of the project. The project's engineering plans, hydrology report, and WQMP will be subject to City review and approval to validate MS4 compliance.

In summary, during construction and operation, project implementation will require plan-based compliance with CWA, NPDES, and local regulations to prevent impacts to water quality standards and the beneficial uses assigned to local receiving waters. The proposed storm drain system and retention facilities will ensure that the stormwater capture and management strategy for project runoff will not result in waste discharge violations. Less than significant impacts are expected.

Cumulative Impacts: None
Mitigation Measures: None

b) **Less than Significant Impact.** The project site and entire City of Indio are located within the domestic water service area of Indio Water Authority (IWA), which covers approximately 38 square miles, consisting of 20 groundwater wells, seven storage reservoirs, one large main pressure zone, and two smaller development-based zones. The Coachella Valley Groundwater Basin is the primary groundwater source for the project region's domestic water purveyors, including IWA. Based on the California Department of Water Resources (DWR), the Coachella Valley Groundwater Basin has an approximate storage capacity of 39.2 million acre-feet (AF) of water within the upper 1,000 feet and is divided into four subbasins: Indio, Mission Creek, Desert Hot Springs, and San Gorgonio. The project site is specifically underlain by the Indio Subbasin, which is also known as the Whitewater River Subbasin. DWR has estimated that the Indio Subbasin contains approximately 29.8 million AF of water in the first 1,000 feet below the ground surface, representing approximately 76 percent of the total groundwater in the Coachella Valley Groundwater Basin.

The *2002 Coachella Valley Groundwater Management Plan* was prepared in collaboration with other local stakeholders with a focus on reducing overdraft, preventing groundwater level decline, protecting groundwater quality, and preventing land subsidence. In 2010, the *2010 Coachella Valley Groundwater Management Plan Update* was prepared to document the accomplishments in reducing overdraft and address changed conditions since 2002. In 2014, the California Legislature signed a three-bill legislative package into law, collectively known as the Sustainable Groundwater Management Act (SGMA), allowing local agencies to manage groundwater resources in a sustainable manner. SGMA required that a Groundwater Sustainability Plan (GSP) or Alternative Plan to a GSP (Alternative Plan) be adopted for basins and subbasins designated by the DWR as medium- and high-priority basins. Basin prioritization is based on a variety of factors such as population, number of wells, and other information determined to be relevant by DWR. The Indio Subbasin was designated as a medium-priority subbasin by DWR.

IWA and other local water purveyors collectively represent the Indio Subbasin Groundwater Sustainability Agencies (GSAs). In January 2017, the GSAs submitted to DWR the 2010 Coachella Valley Water Management Plan (2010 CVWMP), accompanied by an Indio Subbasin Bridge Document, as a SGMA-compliant Alternative Plan. On July 17, 2019, DWR approved the Alternative Plan with a requirement to submit an Alternative Plan Update by January 1, 2022 and every five years thereafter. Based on the Indio Subbasin SGMA documentation, the combined strategies have resulted in significant groundwater storage increases across the subbasin, thus allowing the region to comply with the framework for sustainable management.

In 2019, IWA was among the six urban water suppliers in the Coachella Valley to collaborate on the preparation of the 2020 Coachella Valley Regional Urban Water Management Plan (2020 RUWMP) with regional and individual agency content. The 2020 RUWMP describes the region's water supplies and anticipated demands through 2045, along with each agency's programs to encourage efficient water use.

In June of 2021 IWA's Water Shortage Contingency Plan (WSCP) was prepared to outline each agency's actions that could be taken during a water shortage to reduce demands. According to the WSCP, drought conditions are not expected to affect the region's Colorado River water supply due to the agency's high priority allocation. Colorado River water is not the primary source of urban water supply since it is used for groundwater replenishment and non-potable uses. If a reduction in Colorado River water supply occurred, local agencies would initially reduce deliveries to groundwater replenishment projects. Drought conditions in the Sierra Nevada would have an effect on the State Water Project (SWP) water allocation and reduce the exchange water received by local agencies. Since the SWP exchange water is used for replenishment of the groundwater basin and is not a direct source of urban water supply, water use restrictions due to drought involving the SWP water supply would likely be implemented only as a result of a prolonged drought. During dry periods when less imported water is available, groundwater production is expected to exceed the amount of recharge, and the volume in storage will be reduced. However, these reductions can be reversed in years when additional imported water is available. The Coachella Valley Groundwater Basin is deemed to be a large basin which provides a buffer during dry periods, thus allowing the agencies to develop long-term plans and programs to manage regional water supplies.

Local water purveyors collaborate with the operation and maintenance of three replenishment facilities serving the Indio Subbasin: Whitewater River Groundwater Replenishment Facility, the Thomas E. Levy Groundwater Replenishment Facility, and the Palm Desert Groundwater Replenishment Facility. Artificial replenishment, or recharge, is recognized by the water districts as one of the most effective methods available for preserving local groundwater supplies, reversing aquifer overdraft and meeting demand by domestic consumers. Local agencies are known to have percolated over 650 billion gallons of water back into the aquifer. In the central part of the Coachella Valley, groundwater recharge is provided by the recently constructed first phase of the Palm Desert Groundwater Replenishment Facility, operated by CVWD. According to the CVWD web site, this facility is expected to add up to 25,000 acre-feet of Colorado River water annually into the aquifer. Combined with water conservation and efficiency requirements, individual development projects can contribute to groundwater sustainability by implementing the required stormwater runoff retention and infiltration facilities.

The proposed development is deemed consistent with the City's General Plan land use designation. The established groundwater replenishment facilities described above for the Indio Subbasin are not located near the project. Therefore, from the aspect of land use and location, project implementation is not deemed to be in conflict with any existing or planned groundwater recharge facility or associated infrastructure.

The proposed facilities involving self-storage structures, a small office, and minimal outdoor landscaping. The nature of the proposed facilities will not involve the use of extensive water fixtures. Restroom facilities and associated water uses are expected to be limited to the office space. The proposed operation will be expected to implement water conservation measures, including the use of low-flow plumbing fixtures, drought-tolerant (native) outdoor landscaping, and water-efficient irrigation systems. As a standard condition for service connections, the project will be expected to furnish the appropriate payment to IWA based on the meter size, ongoing flow charges, agency fees, and groundwater recharge fees.

Furthermore, the site plan will continue to utilize a retention system sized to capture and infiltrate the project-related stormwater runoff up to the controlling 100-year storm event, thus contributing toward groundwater recharge instead of producing a condition of urban runoff discharge. As a function of the WQMP, operation of the development will include the required non-structural and structural pollution source control measures that work toward the protection of groundwater quality during the life of the project and under the project owner's responsibility.

Non-structural source control measures consist of site operations, activities, and/or programs to be finalized in the WQMP and implemented by the project operator to educate site managers, employees, and users to prevent potential pollutants from being produced, coming into contact with the storm drain system. Structural source

control measures consist of physical facility design standards to prevent direct contact between potential pollutants and stormwater runoff.

The storm drain and retention system will be privately operated and maintained during the life of the project per a required WQMP agreement to be entered between the project proponent and the City. The proposed facilities are therefore not expected to violate or interfere with the groundwater quality. Regarding ground water quality, less than significant impacts are anticipated.

Cumulative Impacts: None
Mitigation Measures: None

c) i) **Less than Significant Impact.** The partially developed infill project site is absent of any naturally occurring drainage or flood-prone patterns. Therefore, development of the site would not result in any alteration or obstruction of any river, stream, or other naturally occurring drainage pattern.

Based on the USGS Web Soil Survey, the site soils consist of Gilman Fine Sandy Loam and Indio Very Fine Sandy Loam, corresponding to Hydrologic Soil Group B, which is characterized for having a moderate infiltration rates and moderate runoff potential. Given the absence of drainage patterns and slopes, the site soils are not deemed to be prone to existing erosion or siltation.

As a standard practice, erosion and siltation conditions will be prevented during construction and operation through the required Stormwater Pollution Prevention Plan (SWPPP), which will include best management practices for proper soil stabilization and perimeter controls to prevent erosion and siltation from being generated by site clearing, grading, and construction activities. Upon completion and as a compliance requirement, all construction related soil disturbance will be properly restored to a stabilized condition consisting of permanent project improvements (buildings, hardscape, pavement, and landscaping).

During the life of the project, the ongoing maintenance and operation of facilities will ensure that all permanently improved ground surfaces are adequately maintained. As required by the City's engineering standards and practices, all project-related runoff must be adequately handled along engineered conveyances (sheet flow, swales, gutters, or pipes) to the designated retention facilities. Such storm drain system will be a function of the site plan and final engineering plans subject to City review and approval. Less than significant impacts are anticipated regarding substantial erosion or siltation, on- or off-site.

Cumulative Impacts: None
Mitigation Measures: None

ii) **Less than Significant Impact.** Based on Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM) Panel 06065C2251H, effective March 6, 2020, the entire project is located within Zone X, which is deemed an "area of minimal flood hazard". This FEMA classification is not considered a Special Flood Hazard Area (SFHA) or a designated floodway. As a standard requirement, the proposed development includes adequate improvements and site design features to handle the relevant hydrologic conditions in a way that prevents inundation to the proposed structures and facilities. The project will introduce impervious surfaces (buildings, hardscape, asphalt, etc.) to a vacant property, but will also include the required storm drain system (catch basins, lines, outlets, and retention facilities) to intercept, convey and retain the controlling storm event stormwater volume from the site. In adhering to the City's engineering and retention requirements, the proposed development is not expected to substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site. Less than significant impacts are anticipated.

Cumulative Impacts: None

Mitigation Measures: None

iii) **Less than Significant Impact.** The City of Indio is a Permittee of the Whitewater River Watershed Municipal Separate Storm Sewer System (MS4) permit area. Within the City limits, MS4 facilities include a system of conveyances (including roads with drainage systems, municipal streets, catch basins, curbs, gutters, ditches, man-made channels, or storm drains) designed for collecting and conveying stormwater. Storm drain facilities can be public or private. Examples of public facilities include pipes, gutters, channels, and basins occurring within the public right-of-way and/or maintained by a public agency. Private facilities are distinguished by being maintained separately by a private entity. As discussed previously, the project site is absent of any private or public storm drain infrastructure.

The traditional land development process generally results in the conversion of pervious ground surface (pre-development condition) into a setting with a higher impervious cover, occurring through the introduction of buildings, streets, and hardscape (post-development condition). This conversion generally leads to an increase in post-construction runoff volumes and rates compared to the pre-development condition.

As a standard requirement under Section 162.140 in the City's Code of Ordinances, the project is required to include retention facilities sized to contain stormwater volume resulting from the controlling 100-year, 24-hour duration storm event. This retention capacity is provided by multiple underground retention structures sized to contain approximately 39,254 cubic feet, which is sufficient to meet the local engineering requirements. The project's engineering plans and retention levels will be subject to standard City review and approval. Therefore, by comply with the local retention requirements that take into account the existing facilities, the project will prevent a runoff discharge condition capable of contributing to or exceeding the MS4 capacity. Less than significant impacts are anticipated.

Cumulative Impacts: None
Mitigation Measures: None

iv) **Less than Significant Impact.** As previously described, the project site and its surroundings are deemed to be areas of minimal flood hazards according to FEMA FIRM panel 06065C2251H, effective March 6, 2020. As such, the project site is not prone to flood flows or inundation that could be impeded or redirected. Stormwater runoff generated on-site will be handled through on-site retention before any runoff is conveyed to the public storm drain system. Less than significant impacts are anticipated.

Cumulative Impacts: None
Mitigation Measures: None

d) **Less than Significant Impact.** The project is not located near any coastal areas or any large body of water and therefore is not prone to tsunami hazards or seiche risks. The project site is not located in a floodplain or special flood hazard area. Therefore, no impacts are anticipated.

Cumulative Impacts: None
Mitigation Measures: None

e) **Less than Significant Impact.** The project proponent is required to implement a project-specific Water Quality Management Plan (WQMP) to comply with the most current standards of the Whitewater River Region MS4 Permit and with the City's on-site retention standards. The final form of the WQMP will be consistent with final engineering documents to incorporate the grading, hydrology, and other improvement plans to demonstrate how the site design, source controls, and operation and maintenance program will achieve compliance. The

combined retention capacity for the project will meet the stormwater volume resulting from the controlling 100-year storm event. The project's storm water retention facilities will ensure that only stormwater runoff is recharged into the ground via infiltration. Therefore, project implementation is not expected to conflict with the regional groundwater management strategies or with the Indio Subbasin Sustainable Groundwater Management Plan. Less than significant impacts are expected.

Cumulative Impacts: None
Mitigation Measures: None

11. **LAND USE AND PLANNING** - Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
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?	☐	☐	☒	☐

Sources: Indio General Plan, 2019; Indio General Plan Environmental Impact Report, 2019.

a) **No Impacts:** The project site is approximately 5.14 acres of developed and disturbed land located south of Indio Boulevard. The project site existing zoning is Industrial Park District (IP) which is intended to permit more intensive types of industrial operations and facilities. The project is surrounded by developed uses. Developed industrial uses are located west and east of the site, while vacant land is located south of the project site. Indio Boulevard delineates the project's northern-most boundary. The existing developments currently operate independently from each other and are separated by fencing.

The project proposes to subdivide a 5.14-acre site into two lots. Lot 1 would consist of approximately 1.56 acres in the northern portion of the project and will remain in its current condition. Lot 1 is considered "not a part" of the proposed project. Lot 2 would develop approximately 3.58 acres of the 5.14-acre project site. Lot 2 will be utilized for the proposed storage project. Therefore, the proposed project would not physically divide an established community. No impacts are anticipated.

Cumulative Impacts: None

Mitigation Measures: None

b) **Less than Significant Impact.** The project proposes to subdivide a 5.14-acre site into two lots. Approximately 3.58 acres of the 5.14-acre project site (Lot 2) will be utilized for the proposed project while 1.56 acres (Lot 1) will remain "as is" aside from some parking lot improvements. Approximately 3.3 acres of the property are currently developed with one primary building, accessory metal-frame structures, and associated parking lot and paved areas being utilized for administration, design, and distribution operations by a commercial lighting business. The lighting business primary driveway access and parking lot are found at the north-end of the property. The remaining southeast portion (approximately 1.84 acres) remains in a vacant and unpaved condition. The vacant yard is characterized by deposits of various abandoned materials from unknown sources, including stockpiles of soil, green waste, and demolished material, as well as vehicle tires, miscellaneous debris, and two parked vehicles in an apparent inoperable condition.

The project proposes the development of five storage buildings and an office building on the 3.58-acre project site. The proposed office building will be 1,000 square feet, and the proposed storage buildings will be 91,696 square feet, for a total of 92,696 square feet of proposed building. The project also proposes access roads, hardscape, parking areas, and landscaped areas. As previously stated, project lies within the City's Industrial Park District (IP) zone. IP zones are intended to permit more intensive types of industrial operations and facilities. The land use designation for the project is Workplace Employment District, which provides an area for a wide variety of employment-generating activity, including office, industrial and light manufacturing, research and development, and supportive commercial. Workplace Employment Districts are compatible with IP zones. According to Section 159.321 of the Indio Municipal Code, storage facilities are a permitted use within IP zones. The project will comply with the standards for IP zones and Workplace Employment Districts.

Entitlements for the property include Tentative Tract Map 38335 to subdivide the property into 2 lots, and Design Review for the architecture. As previously stated, Lot 1 will consist of the northwestern-most portion of the site. The existing building in the northwest portion will remain. No revisions to this building are proposed. Lot 2 will include the remaining property area, which includes an additional structure and disturbed land. The additional structure is currently located south of the northern building and will be demolished, and a new building will be developed in its place.

Less than significant impacts are anticipated.

Cumulative Impacts: None
Mitigation Measures: None

12. MINERAL RESOURCES -- Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒
b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	☐	☐	☐	☒

Sources: Indio General Plan, 2019; Indio General Plan Environmental Impact Report, 2019; Surface Mining and Reclamation Act.

a) **No Impact.** In accordance with the Surface Mining and Reclamation Act (SMARA), mineral land classification maps and reports have been developed to assist in the protection and development of mineral resources. The project site is located in the Mineral Zone MRZ-1 as shown in the Mineral Land Classification Map. MRZ-1 designations indicate areas where adequate geologic information suggests that no significant mineral deposits are present, or where it is judged that little likelihood exists for their presence. Moreover, the nature of the project does not involve the extraction of mineral deposits. Construction of the proposed facilities would rely on existing local and regional aggregate resources from permitted facilities. The project is not expected to result in a considerable extraction and/or loss of known mineral resources that are considered important to the Coachella Valley Region or residents of California. No impacts are expected related to the loss of availability of known mineral resources.

Cumulative Impacts: None
Mitigation Measures: None

b) **No Impact.** According to the City of Indio General Plan EIR, the property is not located within a locally important mineral resource recovery site. The GP EIR also indicates that the vast majority of the City is designated an MRZ-1 mineral resource zone as mentioned above. Therefore, no impacts are anticipated.

Cumulative Impacts: None
Mitigation Measures: None

13. NOISE -- Would the project result in:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporation	Less Than Significant Impact	No Impact
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?	☐	☐	☐	☒

Sources: Indio General Plan, 2019; Indio General Plan Environmental Impact Report, 2019; Indio Municipal Code; Federal Transit Administration.

a) **Less than Significant Impact.** Noise has been simply defined as "unwanted sound." Sound becomes unwanted when it interferes with normal activities, when it causes actual physical harm or when it has adverse effects on health. Noise is measured on a logarithmic scale of sound pressure level known as a decibel (dB). A-weighted decibels (dBA) approximate the subjective response of the human ear to broad frequency noise source by discriminating against very low and very high frequencies of the audible spectrum. They are adjusted to reflect only those frequencies which are audible to the human ear.

Since the range of intensities that the human ear can detect is so large, the scale frequently used to measure intensity is a scale based on multiples of 10, the logarithmic scale. The scale for measuring intensity is the decibel scale. Each interval of 10 decibels indicates a sound energy ten times greater than before, which is perceived by the human ear as being roughly twice as loud. Based on the logarithmic scale, a doubling of sound energy is equivalent to an increase of 3 dBA, and a sound that is 10 BA less than the ambient sound level has no effect on ambient noise. In general, a 3 dBA change in the ambient noise level is noticeable, while 1-2 dBA change generally are not perceived. Quiet suburban areas typically have noise levels in the range of 40-50 dBA, while areas adjacent to arterial streets are typically in the 50-60+ dBA range. The most common sounds vary between 40 dBA (very quiet) to 100 dBA (very loud). While normal conversational levels are usually in the 60-65 dBA range, and ambient noise levels greater than 65 dBA can interrupt conversations.

Noise levels typically attenuate (or drop off) at a rate of 6 dBA per doubling of distance from point sources (such as industrial machinery). Noise from lightly traveled roads typically attenuates at a rate of about 4.5 dBA per doubling of distance. Noise from heavily traveled roads typically attenuates at about 3 dBA per 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 4.5 dBA, while a noise barrier typically reduces noise levels by 5 to 15 dBA (Federal Transit Administration [FTA]).

The most commonly used figure is the equivalent level (Leq). Equivalent sound levels are not measured directly but are calculated from sound pressure levels typically measured in A-weighted decibels (dBA). The equivalent sound level (Leq) represents a steady state sound level containing the same total energy as a time varying signal over a given sample period and is commonly used to describe the “average” noise levels within the environment. Typically, Leq is summed over a one-hour period.

Day-Night Average Noise Level (LDN) and the Community Noise Equivalent Level (CNEL), representing a composite 24- hour noise level are utilized to assess time-corrected noise environments. The LDN and CNEL are weighted averages of the intensity of a sound, with corrections for time of day, and averaged over 24 hours. The LDN time of day corrections include the addition of 10 decibels to dBA Leq sound levels at night between 10:00 p.m. and 7:00 a.m. The CNEL time of day corrections require the addition of 5 decibels to dBA Leq sound levels in the evening from 7:00 p.m. to 10:00 p.m., in addition to the corrections for the LDN. These additions are made to account for the noise sensitive time periods during the evening and night hours when sound appears louder. LDN and CNEL do not represent the actual sound level heard at any time, but rather represent the total sound exposure. The City of Indio relies on the 24-hour CNEL level to assess land use compatibility with transportation related noise sources, and therefore, this analysis uses CNEL to assess 24-hour transportation noise levels.

Existing noise sources in Indio include transportation and stationary sources. Transportation noise sources include motor vehicle traffic, railroad traffic, and aircraft operations and overflights. Stationary noise sources include industrial, commercial, and agricultural operations, air conditioning and other mechanical equipment, as well as landscaping equipment and human speech.

Sound from a localized source (i.e., a stationary point source) propagates uniformly outward in a spherical pattern. The sound level attenuates (or decreases) at a rate of 6 dB for each doubling of distance from a point source. Highways consist of several localized noise sources on a defined path and hence can be treated as a line source, which approximates the effect of several point sources. Noise from a line source propagates outward in a cylindrical pattern, often referred to as cylindrical spreading. Sound levels attenuate at a rate of 3 dB for each doubling of distance from a line source. Effective noise barriers can reduce noise levels by 10 to 15 dBA, cutting the loudness of traffic noise in half. A noise barrier is most effective when placed close to the noise source or receptor. For a noise barrier to work, it must be high enough and long enough to block the path of the noise source.

Some land uses are more tolerant of noise than others. For example, schools, hospitals, churches and residences are more sensitive to noise intrusion than are commercial or industrial developments and related activities. The Federal Highway Administration (FHWA) encourages State and Local government to regulate land development in such a way that noise-sensitive land uses are either prohibited from being located adjacent to a highway, or that the developments are planned, designed, and constructed in such a way that noise impacts are minimized.

The City of Indio addresses two separate types of noise sources through the CEQA process: mobile and stationary. The mobile or transportation related noise impacts are controlled using the 24-hour Community Noise Equivalent Level (CNEL) to assess land use compatibility for community noise exposure. The CNEL noise metric allows the total noise exposure of an area resulting from many individual noise events over a long period of time to be summed and expressed as a single value and mapped as a series of contour lines around the noise source. In the case of highway noise, CNEL values typically reflect the noise exposure over the peak activity period or over a year, as is often the case with airport contours. The City of Indio noise standards designates a maximum of 65 CNEL as acceptable in outside activity areas and 45 CNEL as acceptable in interior living areas for residential areas.

The City of Indio has adopted a Noise Element of the General Plan to minimize exposure to excessive noise which can adversely affect physical and psychological well-being, property values, the environment, and quality of life. The noise criteria identified in the City of Indio Noise Element are guidelines to evaluate the land use compatibility of transportation-related noise. The compatibility criteria, shown in the exhibit below, provides the City of Indio with a planning tool to gauge the compatibility of land uses relative to existing and future exterior noise levels.

The Noise Compatibility Guidelines describes categories of compatibility and not specific noise standards. The storage facility industrial land use is considered acceptable with unmitigated exterior noise levels of less than 70 dBA CNEL, and conditionally acceptable exterior noise levels approaching 80 dBA CNEL, new construction or development should be undertaken only after a detailed analysis of the noise reduction requirement is made and the needed noise insulation features are included in the design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning will normally suffice.

Table XIII-1 Noise Compatibility Guideline

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 shall not be undertaken.

Source: City of Indio General Plan Noise Element, Table 11-1.

Potential noise impacts are commonly divided into two groups: temporary and long term. Temporary impacts are usually associated with noise generated by construction activities. Long-term impacts are further divided into impacts on surrounding land uses generated by the proposed project and those impacts that occur at the proposed project site. Off-site impacts from on-site activities, short-term and long-term, are measured against the Noise Ordinance criteria. Activities for the proposed project will be required to meet the noise ordinance standards along with any noise generating activities associated with the operation of the project.

Short-Term Construction Noise

Noise generated by the project construction equipment will include a combination of trucks, power tools, concrete mixers, and portable generators. The mix and operation of construction equipment is expected to occur during site preparation, grading, utilities/building construction, paving, and architectural coating. Noise levels generated by heavy construction equipment can range from approximately 62 dBA to more than 80 dBA when measured at 50 feet. Noise levels generated during various construction phases are presented in Table XIII-1, *Typical Maximum Noise Levels for Construction Phases*. Equipment estimates used for the analysis for grading and building construction noise levels was provided by the U.S. Department of Transportation and are representative of worst-case conditions, since it is unlikely that all the equipment contained on-site would operate simultaneously. Additionally, these noise levels diminish with distance from the construction site at a rate of 6 dBA per doubling of distance.

Table XIII-2 Typical Maximum Noise Levels for Construction Phases

	Appropriate Leq dBA without Noise Attenuation			
Construction Phase	25 Feet	50 Feet	100 Feet	200 Feet
Clearing	90	84	78	72
Excavation	94	88	82	78
Foundation/Conditioning	94	88	82	78
Laying Subbase/Paving	85	79	73	67

Source: U.S. Department of Transportation, Construction Noise Handbook, Chapter 9.0, August 2006.

During construction, the project shall follow common industry standards that will help limit noise level increases. For example, all construction equipment, fixed or mobile, should be equipped with properly operating and maintained mufflers and the engines should be equipped with shrouds. Approved routes shall be used to minimize exposure of sensitive receptors to potential adverse levels from truck travel. All construction equipment shall be in proper working order and maintained to reduce backfires. Grading activities would involve the use of standard earth moving equipment, which would be stored on the site during construction to minimize disruption of the surrounding land uses. Above-grade construction activities would involve the use of standard construction equipment, such as hoist, mixer trucks, concrete pumps, and other related equipment.

Construction traffic and equipment is also anticipated to generate noise along access routes to the proposed development. The larger pieces of heavy equipment would be moved onto the development only one time for each construction activity (i.e., site prep, grading, etc.). Daily transportation of construction workers is expected to cause increases in noise levels along surrounding roadways.

As a standard requirement, the project is expected to abide by the City's Noise Ordinance regulations on construction hours, which limit activities to the less sensitive times of the day. Section 95C.08 of the City of Indio Municipal Code indicates that construction activity is limited to the following permitted hours:

Table XIII-3 Permitted Construction Hours

	Pacific Standard Time	***Pacific Daylight Time***
Monday through Friday	7:00 a.m. to 6:00 p.m.	6:00 a.m. to 6:00 p.m.
Saturday	8:00 a.m. to 6:00 p.m.	7:00 a.m. to 6:00 p.m.
Sunday and Holidays	9:00 a.m. to 5:00 p.m.	

Project construction will occur during the hours permitted by the City. Additionally, the project will utilize construction equipment compliant with industry standards. Moreover, project-related construction noise will be temporary, and cease once the project is developed. With the foregoing, less than significant impacts are anticipated during project construction.

Long-Term Operational Noise

The project is located within a developed context within the City of Indio, with commercial and industrial facilities north, west, and east of the site. The southern project boundary lies approximately 200 feet north of existing residential properties. Acceptable noise levels within industrial land uses do not exceed 70 dBA CNEL. Noise above 70 dBA is considered conditionally acceptable by the City of Indio. Single family residential areas are the most noise sensitive, with acceptable levels up to 60 dB CNEL or less. Single-family residences are conditionally acceptable in noise environments of up to 75 dB CNEL.

Existing noise contributors in the area include the commercial and industrial uses surrounding the project site, the vehicular traffic from Indio Boulevard, the occasional train along the railroad, and the occasional plane taking off and landing at the Bermuda Dunes Airport. Railroad noise generates up to 79 CNEL at 100 feet from the railroad and occurs approximately 20 to 30 times a day (GP EIR). The project is located approximately 250 feet south of the railroads. Noise levels decrease 6 dB each time the distance from the sound source doubles, therefore, observed noise from the railroad is less than 73 dB at the project site. The project is located within the airport's 55-60 CNEL noise contour. Finally, noise generated by vehicular traffic along Indio Boulevard and the Interstate 10 freeway, contribute to the existing ambient noise in the area. Currently, the noise contours from these roadways at 60 – 65 dB CNEL at the project site. projected noise contours from these roadways are anticipated to remain at 60 – 65 dB CNEL when observed at the project site (Figure 11-3, *Projected Future Transportation Noise Contours,* Indio GP). These noise levels are acceptable within the existing land use category.

Currently, the southern portion of the project site does not generate noise due to its vacant and undeveloped character. The project is proposing the development and operation of a storage facility consisting of five storage buildings. Compared to the current undeveloped use, the operation of the project would introduce noise to the project property. Typical noise generated by storage facilities includes cars or trucks driving slowly to their storage unit, idling cars or trucks, the opening and closing of car doors and garage doors to access the units, and people talking. These noises are typical of commercial and industrial land uses. People talking at normal volume generates noise levels of 60 dBA, where light car traffic can vary between 50 dBA (small automobile at low speeds) to 70 dBA (suburban street). Noise generated by the project will not usually occur continuously during the day, since the operation of storage facilities typically involves few people entering during the day to access their units. It is also likely that at certain times during the day that no cars will be onsite. Additionally, the proposed storage facility is separated from the existing residential structures by vacant land and a block wall, which acts as a noise barrier and reduces noise between property lines. The project would contribute vehicular traffic noise inconsistently throughout the day due to people accessing their storage unit. The project is anticipated to generate 131 daily trips (see Transportation section). The 131 trips daily to the project site would introduce some noise to the project site, however, the increase in noise would not be significant since vehicles traveling onsite would be required to drive at reduced speeds, which reduces noise generated from vehicles.

Additionally, the project is located in an industrial context within the City of Indio, therefore, noise generated from storage facilities would not result in significant noise.

Although the project would introduce noise compared to the existing state of the project, noise generated by the storage facility will be brief and not continuous throughout the day. Noise generated by the project will also be confined to normal business hours. Impacts to the project by existing area noise sources will be mitigated by the surrounding land uses and building construction standards.

Overall, the proposed project will not result in substantial noise. Impacts will be less than significant.

Cumulative Impacts: None
Mitigation Measures: None

b) **Less than Significant Impact.** Groundborne vibration, also referred to as earthborne vibration, can be described as perceptible rumbling, movement, shaking or rattling of structures and items within a structure. Groundborne vibration can generate a heightened disturbance in residential areas. These vibrations can disturb residential structures and household items while creating difficulty for residential activities such as reading or other tasks. Although groundborne vibration is sometimes perceptible in an outdoor environment, disturbance is primarily experienced inside a building. Groundborne vibration can be measured in terms of amplitude and frequency or vibration decibels (VdB). Trains, buses, large trucks and construction activities that include pile driving, blasting, earth moving and heavy vehicle operation commonly cause these vibrations. Other factors that influence the disturbance of groundborne vibration include distance to source, foundation materials, soil and surface types.

Vibration amplitudes are usually expressed as peak particle velocity (PPV). The PPV is defined as the maximum instantaneous peak of the vibration signal in inches per second. Construction activity can result in varying degrees of ground vibration, depending on the equipment and methods employed. Operation of construction equipment causes ground vibration levels that spread through the ground and diminish in strength with distance. Ground vibration levels associated with various types of construction equipment are summarized in the table below. With respect to vibration annoyance potential, maximum PPV of 0.01 in/sec is barely perceptible, 0.04 is distinctly perceptible, 0.10 is strongly perceptible (begin to annoy people), and 0.4 would result in a severe human response.

Table XIII-4 Vibration Source Levels For Construction Equipment

Equipment	PPV (in/sec) at 25 feet
Small bulldozer	0.003
Jackhammer	0.035
Loaded Trucks	0.076
Large bulldozer	0.089
Vibratory Roller	0.210

Source: Caltrans Transportation and Construction Vibration Guidance Manual, April 2020

The project is surrounded by developed land. Residential uses are located south of the project boundary, while commercial and industrial uses are located north, west and east of the project. The existing source of groundborne vibration is attributed to the circulation of vehicles and trucks along surrounding roadways as well as the railroad located north of Indio Boulevard.

The project site has been previously disturbed and is in a relatively flat condition. Construction of the project will involve the temporary operation of vehicles and equipment that could result in localized, short-term vibration increases during the permitted hours of construction established by the City. All construction

equipment staging will be located within the temporary construction limits, while vehicular and equipment access to the construction site would be restricted to only the approved entry points that minimize disturbance to local traffic. Short-term increases in vibration and sound during construction are not expected to result in significant impact.

The closest sensitive land use is the existing residential structures immediately south of the project site. Development of the proposed storage facility would include grading of the site and loaded trucks. As indicated in the table above, loaded trucks result in vibration levels of 0.076 (in/sec) PPV, at 25 feet. These vibration levels would be below the vibration damage potential threshold for older residential structures (0.3 in/sec PPV). The use of small bulldozers, large bulldozers, or vibratory rollers will not be necessary during construction of the site. Therefore, the proposed project impacts on exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels would be less than significant.

However, most construction equipment does not operation in the same location for prolonged periods of time. Therefore, even if construction equipment were to operate near a building where receptors may feel vibration, it would only be for a temporary amount of time and would not be considered excessive.

After construction, the nature of the proposed passive park would not typically involve activities expected to generate excessive vibration or groundborne noise. All activities within the project will be required to adhere to the City's Noise Ordinance. Less than significant impacts are anticipated.

Cumulative Impacts: None
Mitigation Measures: None

c) **Less than Significant Impact.** The Bermuda Dunes Airport, a private airstrip, is located approximately 1.14 miles northwest of the project. As a result, the project is located within Compatibility Zone C of the Bermuda Dunes Airport influence and planning area. The project, which proposes a storage facility, is an acceptable use within Zone C. Additionally, the project location sits within the Airport's 55 CNEL noise contour. However, the project does not propose incompatible uses (such as residential properties, hospitals, nursing homes, schools, etc.). Although flights approaching and departing the airports may fly over the project site with an intermittent frequency, less than significant impacts are anticipated.

Cumulative Impacts: None
Mitigation Measures: None

14. **POPULATION AND HOUSING** – Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
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?	☐	☐	☐	☒

Sources: Indio General Plan, 2019; Indio General Plan Environmental Impact Report, 2019.

a) **Less than Significant Impact.** The project proposes the development of five storage buildings and an office building on approximately 3.58 acres of the 5.14-acre project site. The proposed office building will be 1,000 square feet, and the proposed storage buildings will be 91,696 square feet, for a total of 92,696 square feet of proposed building. The project also proposes access roads, hardscape, parking areas, and landscaped areas.

The proposed storage facility will not result in substantial population growth. The project site is located within the Industrial Park District in the City of Indio. The five storage buildings will allow people to store items within the buildings and the facility office is expected to have one employee. Additional employees may include occasional maintenance or janitorial employees or security. However, the addition of the project-related employees would not induce substantial population growth. Moreover, the project is surrounded by existing industrial developments and vacant land and would not extend any infrastructure or roadways within the project vicinity, any infrastructure improvements associated with the proposed project would consist of local connections to the project site. Less than significant impacts are anticipated.

Cumulative Impacts: None
Mitigation Measures: None

b) **No Impact.** The proposed project is characterized by developed industrial uses in the northwestern portion of the site, and disturbed vacant land in the southeastern portion of the site. The site, which is located within the Industrial Park District, does not contain residential uses. Therefore, no people will be displaced and no replacement housing will be required. No impact is anticipated.

Cumulative Impacts: None
Mitigation Measures: None

15. **PUBLIC SERVICES** –	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
Fire protection?	☐	☐	☒	☐
Police protection?	☐	☐	☒	☐
Schools?	☐	☐	☒	☐
Parks?	☐	☐	☒	☐
Other public facilities?	☐	☐	☒	☐

Sources: Indio General Plan, 2019; Indio General Plan Environmental Impact Report, 2019; Indio Fire Department website; Desert Sands Unified School District Fee Justification.

a) Fire

Less than Significant Impact. The City of Indio contracts with Riverside County Fire Department/Cal Fire (RCFD) for a full range of fire and emergency services 24 hours a day, 7-days a week. According to the City of Indio Fire Department's website, the City has 4 fire stations and a total of 56 full-time personnel. Fire Station 80, located at 81025 Avenue 40 is the closest station to the project site and is located approximately 3.1 driving miles north of the project. There are 10 firefighters assigned to this station that staff one paramedic fire engine and one paramedic ambulance. A reserve ambulance is also located here. Fire Station No. 88 is located at 46621 Madison Street, and approximately 3.2 driving miles south of the project. The Indio Fire Department Station is located at 46990 Jackson Street is the closest station to the project site and is approximately 4.3 driving miles southeast of the project. Fire Station 87 is located at 42900 Golf Center Parkway, is located approximately 5.2 miles north of the project.

The project proposes to develop one, 1,000-square-foot office building, and five storage buildings, ranging from 2,400 square feet to 47,495 square feet. Development of this project is not expected to substantially increase demand on fire services. The project site and surrounding area is currently provided fire protection and emergency services. The project will be reviewed by City and Fire officials to ensure adequate service and fire safety continue to be maintained as a result of project implementation.

The addition of the storage facilities proposed for the project could result in additional incident calls but not to the extent that would substantially delay response times. Based on the project's proximity to fire station 80 and 88, the proposed project could be adequately served by fire protection services within the 5-minute response time and no new or expanded facilities would be required. Additionally, the project would be required to implement all applicable and current California Fire Code Standards. This would include the installation of fire hydrants, as well as automatic fire sprinkler systems inside the buildings. The project will also be required to comply with the City's Development Impact Fees (DIF) to assist with the funding of public facilities and services, including fire, therefore, less than significant impacts are expected.

Cumulative Impacts: None
Mitigation Measures: None

Police

Less than Significant Impact. Police services are provided by the Indio Police Department. According to the Police Department's web site, the Indio Police Department employs approximately 62 sworn officers and 37 non-sown staff, totaling 99 authorized positions. Additionally, the Department is supported by the Citizens Helping Indio Police (CHIP) volunteer program who logged over 8,384 hours of service to the community. The City of Indio Police Department is located at 46-800 South Jackson Street in Indio, approximately 4.0 driving miles from the subject property.

As previously discussed, the project proposes to develop one office building and five storage buildings on a portion of the 5.14-acre site. The project site is partially developed and is currently provided police and emergency services. The project will be reviewed by City and police officials to ensure adequate response times and public safety is maintained as a result of project implementation.

The addition of the storage facilities proposed for the project could result in additional incident calls but not to the extent that would substantially delay response times. The project would also be required to comply with Development Impact Fees in place at the time of construction. These fees on new development allow the City to continue to finance public facilities including public services such as police. It also assists in offsetting impacts by providing sufficient revenue for necessary emergency service improvements to ensure acceptable response times, equipment and personnel are maintained. Therefore, development of the proposed project will result in less than significant impacts to police services.

Cumulative Impacts: None
Mitigation Measures: None

Schools

Less than Significant Impact. The proposed project lies within the Coachella Valley Unified School District. The nearest school is Carrillo Ranch Elementary School and is approximately 0.22 miles southwest of the project site. The project proposes to develop five storage buildings and an office building on the project site. The proposed office building will be 1,000 square feet, and the proposed storage buildings will be 91,696 square feet, for a total of 92,696 square feet of proposed building.

The proposed storage facility would generate at least one office employee during operation of the site. Additional employees could include occasional maintenance person or security. Employment associated with the proposed project would not result in the need for new or additional school facilities to be constructed. Moreover, Assembly Bill 2926 and Senate Bill 50 (SB 50) allow school districts to collect "development fees" for all new construction for residential/commercial and industrial use. At the time of writing, DSUSD developer fees are $4.08/sq.ft. for residential and $0.66/ sq.ft. for commercial. All though the church expansion would not generate students, the District still requires developer fees to assist with offsetting impacts of employees generated by the project and the potential students that would be generated by employees. Monies collected are used for construction and reconstruction of school facilities. Less than significant impact to school services are expected.

Cumulative Impacts: None
Mitigation Measures: None

Parks

Less than Significant Impact. The City of Indio provides a wide range of park and recreation facilities with various amenities. The proposed storage facility would not create additional demand for public park facilities,

nor result in the need to modify existing or construct new park facilities. The project would be required to comply with the City's Development Impact Fees which include Park and Recreation fees, therefore less than significant impacts to park services are expected.

Cumulative Impacts: None
Mitigation Measures: None

Other Public Facilities
Less than Significant Impact. Future development is not expected to contribute to an increased need for any public services beyond those discussed in this section. Therefore, the proposed project is anticipated to result in less than significant impacts.

Cumulative Impacts: None
Mitigation Measures: None

16. **RECREATION** –	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
a) Would the project 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) Does the project include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?	☐	☐	☐	☒

Sources: Indio General Plan, 2019; Indio General Plan Environmental Impact Report, 2019.

a) **Less than Significant Impact.** The City of Indio currently owns and maintains 15 public parks totaling approximately 63 acres. Recreational facilities include greenways and trails, which provide walking, biking, hiking, equestrian, greenway, long distance, off road, rail, canal, and water paths. The City parks are open to the public, therefore, the residents of the proposed project would be able to enjoy the recreational amenities. The project includes a storage facility, consisting of a 1,000-square-foot office building, and five storage buildings ranging from 2,400 square feet to 47,495 square feet. The project is located within the Industrial Parks District zone in the City of Indio. The project is not anticipated to increase the use of existing neighborhood and regional parks, however, the project will comply with the City's parkland in lieu fee (Quimby) and other development impact fees. The project will not substantially increase use of existing parks to the point of accelerated deterioration, and less than significant impacts are expected.

Cumulative Impacts: None
Mitigation Measures: None

b) **No Impact.** The construction and operation of the proposed cultivation facility, located within an area zoned Industrial Park District, will not involve a recreational facility. No construction or expansion of other recreational facilities is required for project implementation and no impacts are anticipated.

Cumulative Impacts: None
Mitigation Measures: None

17. **TRANSPORTATION** – Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
a) Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	☐	☐	☐	☐
b) Would the project conflict or be inconsistent with CEQA guidelines section 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?	☐	☐	☐	☐

Sources: Indio General Plan, 2019; Indio General Plan Environmental Impact Report, 2019.

a) **Less than Significant Impact with Mitigation.**

Setting

The proposed project property is located at 81161 Indio Boulevard, which currently consists of approximately 5.14 acres south of Indio Boulevard and 400 feet east of Madison Street. The project is characterized by developed industrial uses in the northwestern portion of the site, and disturbed vacant land in the southeastern portion of the site. The property can be identified as Assessor's Parcel Numbers (APN) 610-030-001 within Section 15, Township 5 South, Range 7 East, San Bernardino Base and Meridian.

The project proposes to subdivide the 5.14-acre site into two lots. Approximately 3.58 acres of the 5.14-acre project site will be utilized for the proposed project while 1.56 acres will remain as is and is considered Lot 1 and "not a part" of the proposed storage project on Lot 2.

Highway 111 provides regional access at the project's main access point.

The project site is surrounded by industrial uses and vacant land. Specifically, Indio Boulevard is located to the north; developed industrial properties are located to the west; a mix of commercial, industrial, and residential uses is located to the east; and vacant land is located to the south. A single-family residential community is located approximately 200 feet south of the project boundary, separated by vacant land.

Project Summary

The project proposes the development of five storage buildings and an office building on the future Lot 2 of the project site. The proposed office building will be 1,000 square feet, and the proposed storage buildings will be 91,696 square feet, for a total of 92,696 square feet of proposed building. The project also proposes access drives, hardscape, parking areas, and landscaped areas. Primary access is provided on Highway 111, emergency access is located at the southeast corner of the site.

Level of Service Standard (LOS)

As required by SB 743, Vehicle Miles Traveled (VMT) replaced the former metric used to analyze traffic impacts which was LOS. With the implementation of SB 743, intersection LOS is not calculated to determine transportation impacts, however it provides information regarding intersection capacity and general plan consistency for the City. VMT is discussed following this LOS discussion.

Level of Service (LOS) is a measure of transportation system performance based upon the ratio of traffic volume relative to the capacity of the roadway or intersection. The volume-to-capacity ratio (V/C) indicates the overall performance of the roadway segment or intersection and corresponds to a rating of A through F identifying its

level of capacity utilization and relative level of congestion. LOS A represents free-flow traffic with little or no delay whereas LOS F represents a breakdown of traffic flow and a high incidence of delay.

Table XVII-1 Level of Service
Description Mid-Link and Uninterrupted Flow

Level of Service	Volume/Capacity Ratio
A	0.00 – 0.60
B	0.61 – 0.70
C	0.71 – 0.80
D	0.81 – 0.90
E	0.91 – 1.00
F	Not Meaningful
Source: Highway Capacity Manual, Transportation Research Board – Special Report 209, National Academy of Science, Washington, D.C. 2000.	

For roadway segment travel LOS is a measure of the flow of traffic, while for intersections, the LOS is based on the number of seconds the vehicle is delayed in passing through the intersection. Although accepting a lower level of service (LOS E or even F) at certain intersections and segments during peak season may result in periodic congestion, once familiar with network constraints, travelers will seek alternative paths and traffic will be distributed to those parts of the network with surplus capacity. The City of Indio has established LOS D as the minimum level of service for its street segments.

Table XVII-2 Level of Service Thresholds

Level of Service	**Intersection Control Delay (Seconds / Vehicle)**	
	Signalized Intersection	**Unsignalized Intersection**
A	≤ 10.0	≤ 10.0
B	> 10.0 to ≤ 20.0	> 10.0 to ≤ 15.0
C	> 20.0 to ≤ 35.0	> 15.0 to ≤ 25.0
D	> 35.0 to ≤ 55.0	> 25.0 to ≤ 35.0
E	> 55.0 to ≤ 80.0	> 35.0 to ≤ 50.0
F	> 80.0	> 50.0

Source: Transportation Research Board, Highway Capacity Manual (6th Edition.)

Transportation Uniform Mitigation Fee (TUMF)

The Transportation Uniform Mitigation Fees (TUMF) program identifies network backbone and local roadways that are needed to accommodate growth. The regional program was put into place to ensure that developments pay their fair share, and that funding is in place for the construction of facilities needed to maintain an acceptable level of service for the transportation system. The TUMF is a regional mitigation fee program and is imposed and implemented in every jurisdiction in Western Riverside County.

Alternative Transportation

The City of Indio is served by the SunLine Transit Agency. SunLine Transit Agency provides bus services to the City of Indio through Lines 1, 6 and 8. Route 1 is the nearest route to the project.

SunDial is a valley wide, origin-to-destination paratransit service designed to meet the requirements of the Americans with Disabilities Act (ADA). The purpose is to provide next day public transportation service for persons who are unable to use regular SunLine service. SunDial service is available within 3/4 of a mile on either side of any local SunLine route (not including Commuter Link 220 & Line 95).

Transit service is reviewed and updated by SunLine periodically to addresses issues such as budget, ridership and community demand. Changes in land use can affect these periodic changes, which could lead to enhanced service where appropriate.

Vehicle Miles Traveled (VMT)

The current recommended metric in the CEQA guidelines for transportation impacts is VMT per capita per SB 743. The legislative intent of SB 743 is to balance the needs of congestion management with statewide goals for infill development, promotion of public health through active transportation and reduction of greenhouse gas emissions.

Vehicle Miles Travelled is a measure of the amount of travel for all vehicles in a geographic region over a given period of time, typically a one-year period. The analysis of Vehicle Miles Traveled (VMT) (SB743) attributable to a project in CEQA went into full effect statewide on July 1, 2020. According to the Governor's office of Planning and Research (OPR) proposed CEQA Guideline Implementing SB 743, projects that decrease vehicle miles traveled in a project area compared to existing conditions should be considered to have a less than significant transportation impact. The California Air Pollution Control Officers Association (CAPCOA) publishes a resource for Local Government to assess emission reductions from Greenhouse Gas Mitigation Measures. The CAPCOA report recognizes that land use planning provides the best opportunity to influence GHG emissions through a reduction in overall VMT.

According to the National Center for Sustainable Transportation, a number of cities, regions and states across the United States have begun to deemphasize vehicle delay metrics such as LOS. In their place, policymakers are considering alternative transportation impact metrics that more closely approximate the true environmental impacts of driving. VMT is one metric that is increasingly being utilized.

Goals for reducing Greenhouse Gasses (GHG) have been the primary motivation for the shift to VMT measures. Reductions in VMT produce many other potential benefits such as reductions in other air pollutant emissions, water pollution, wildlife mortality and traffic congestion, as well as improvements in safety and health and savings in public and private costs.

Existing Transportation Conditions Summary

Regional access to the project site is provided by Indio Boulevard, which serves as the location for primary access to the project. This roadway becomes Jefferson Street and accesses Interstate 10 approximately 1.5 miles to the northwest.

Indio Boulevard is a Secondary Highway oriented in a northwest-southeast direction, it exists as a four-lane roadway divided by a landscape median or a center left-turn lane. The road is fully improved with curb, gutter and a sidewalk adjacent to the proposed project access point. A Class 2 Bike Lane is located on the north side of the roadway, which provides a striped lane for one-way bike travel.

Future Traffic Conditions

The Institute of Transportation Engineers (ITE) *Trip Generation Manual* (11th Edition, 2021) trip generation rates were utilized to determine trip generation for the proposed project. Based on the proposed project description the following ITE land uses Code were utilized: 151 – Mini Warehouse; and 715 – Single Tenant Office Building. These rates were determined to represent the proposed project most closely. The analysis calculates that, upon buildout, the project will generate approximately 131 new daily vehicle trips or average daily trips (ADT), with 10 ADT expected to be generated in the morning peak hour and 14 ADT in the evening peak hour.

Table XVII-3 Project Trip Generation Summary

Trip Generation Rates						
Land Use (ITE Code)	**Unit**	**AM Peak Hour**		**PM Peak Hour**		**Daily Trip Rate**
		In:Out Split	**Trip Rate**	**In:Out Split**	**Trip Rate**	
Single Tenant Office (715)	Employee	0.47:0.06	0.53	0.08:0.43	0.51	3.70
Mini Warehouse (151)	Acres	2.52:1.98	2.58	2.0:1.5	3.57	35.43

Trips Generation Results								
Land Use (ITE Code)	**Quantity**	**AM Peak Hour**			**PM Peak Hour**			**Daily**
		In	**Out**	**Total**	**In**	**Out**	**Total**	
Single Tenant Office (715)	1	0	0	1	0	0	1	4
Mini Warehouse (151)	3.6	4	5	9	6	6	13	127
Total		**4**	**5**	**10**	**6**	**6**	**14**	**131**

1. Source ITE = Institute of Transportation Engineers, Trip Generation Manual, 11th, 2021
2. Ac. = Acres

According to Appendix B of the *Riverside County Transportation Analysis Guidelines for Level of Service and Vehicle Miles Traveled*, Traffic Analysis Exemptions, certain types of development proposals are generally exempt from Traffic Analysis requirements per Board of Supervisor's action November 5, 1996 (Item no. 3.27). **Exemption #10** indicates that an exemption is appropriate for any use which can demonstrate, based on the most recent edition of the Trip Generation Report published by the Institute of Transportation Engineers (ITE) or other approved trip generation data, trip generation of less than 100 trips during the peak hours. As noted above the project is anticipated to generate approximately 58 ADT during the AM peak hour and 95 ADT during the PM peak hour and is therefore not required to prepare a formal Traffic Study.

The storage facility is intended to serve the vicinity. Trip generation is not anticipated to change significantly with the approval of the project design.

Design recommendations:

Indio Boulevard

- Return roadway to existing conditions following construction of the main project access point.

Congestion Management Plan

The County Congestion Management Plan (CMP) requires a LOS E or better for regional roadways. The generation, distribution, and management of project traffic is not expected to conflict with the CMP; no CMP roadways occur in the vicinity of the project. The project and background traffic will not exceed City level of service standards or travel demand measures, or other standards established by the City or Riverside County Transportation Commission (RCTC) for designated roads or highways.

The Transportation Uniform Mitigation Fees (TUMF) program identifies network backbone and local roadways that are needed to accommodate growth.

Prior to the original project construction, the project proponent of the existing project would have been required to contribute development impact fees (e.g., traffic signal mitigation fees) and would have participated in the Traffic Uniform Mitigation Fee (TUMF) program. The project is proposing demolition, construction, and changes to operations on a portion of the original property and will be required to pay these fees. Following payment of TUMF less than significant impacts are anticipated.

Alternative Transportation

SunLine Transit Agency buses are wheelchair accessible and include bicycle racks accommodating two or three bicycles. There are no bus routes on Indio Boulevard. The nearest bus route to the project is Line 1. The nearest bus stop is located approximately 2.5 miles in driving/biking distance to the southeast at the intersection of Highway 111 and Golf Center Parkway. The project is not proposing any elements that will change existing operations. The use of local bus services by project users is not expected to conflict with or substantially increase the demand for this transit service. Project implementation is not anticipated to interfere with the existing service or performance at bus stop facilities. The proposed project would not impact pedestrian or bicycle mobility.

The project is not anticipated to conflict with an applicable plan, ordinance or Policy establishing measures of effectiveness for the performance of the circulation system. No impacts are expected.

Indio Municipal Code Standard Conditions of Approval

1. The following items a reflect *Indio Municipal Code* or City of Indio policy requirements that apply to all developments as Conditions of Approval.

2. Highway 111 shall be improved on and adjacent to the site per the design standards specified by the City of Indio

3. Clear unobstructed sight distances shall be provided at the site access points and at all internal intersections. Sight distance should be reviewed at the project access points with respect to City of Indio sight distance standards at the time of preparation of final grading, landscape and street improvement plans.

4. The site access design shall accommodate the largest vehicles expected to negotiate the access and internal circulation system. Landscaping, monuments, and other objects shall be avoided in the off-tracking area at the site access connections.

5. The project proponent shall provide accessible routes of travel (including compliant curb ramps, sidewalks, and other improvements) along all public streets and within all public spaces and common areas, in accordance with current ADA guidelines and standards.

6. To ensure compliance with City of Indio roadway and access design standards, the final layout and site access design shall be subject to the review and approval of the City Traffic Engineer during the development review process. Entry drives, the internal circulation design, and other features may require additional street widths, as determined by the City Traffic Engineer.

7. The applicant shall coordinate with SunLine Transit Agency regarding the need for public transit facilities on- site such as a lighted covered transit shelter or a bus turnout.

8. The project proponent shall contribute various development fees, as required by the City of Indio.

9. The project proponent shall contribute traffic impact mitigation fees, by participating in the Traffic Uniform Mitigation Fee program.

Therefore, the project's conditions of approval during design, approval and construction will ensure that the project results in less than significant impacts relative to the applicable plan, ordinance or Policy establishing measures of effectiveness for the performance of the circulation system.

Cumulative Impacts: None
Mitigation Measures: None

b) **Less than Significant Impact.**

Vehicle Miles Travelled (VMT)

The California Environmental Quality Act (CEQA) procedures for determination of transportation impacts have recently changed to an evaluation of Vehicle Miles Traveled (VMT) rather than vehicle delay or LOS, due to Senate Bill 743 (SB 743). Vehicle delay and level of service are still used in Indian Wells traffic studies when required.

Methodology

The City of Indio utilizes the December 2020 County of Riverside Transportation Guidelines for VMT assessments. Figure 3 of the December 2020 County Guidelines for VMT sets forth screening criteria under which Projects are not required to submit detailed VMT analysis. This guidance for determination of non-significant VMT impact is primarily intended to avoid unnecessary analysis and findings that would be inconsistent with the intent of SB 743. VMT screening criteria for development projects include the following:

- **Small Local Serving Projects** with low trip generation based on the County Greenhouse Gas Emissions Screening Tables resulting in a 3,000 metric tons of Carbon Dioxide Equivalent per year screening level threshold. Project trip generation is less than 110 trips per day per the ITE Manual or other acceptable source determined by Riverside County. Specific examples include retail buildings with area less than or equal to 60,000 sf, general office buildings less than or equal to 165,000 sf, and general light industrial buildings less than or equal to 179,000 sf., and warehouse (unrefrigerated) buildings less than or equal to 208,000 sf.
- **Map Based Screening** within an area of development under threshold as shown on screening map allowed by the Engineering Department.
- **Local Essential Service** includes day care, park, medical/dental office building under 50,000 square feet, police or fire facility, and government offices which are considered local-serving facilities that shorten non-discretionary trips by putting those services closer to residents, resulting in an overall reduction in VMT.

Project Screening

The project would qualify for screening under the Small Projects category. This category includes unrefrigerated warehouse buildings less than or equal to 108,000 sf. Construction of the project would provide self-storage service to the existing area. The project has been reviewed for VMT screening based on the criteria mentioned above and no further VMT analysis is needed.

Conclusions

The project is considered a Small local-serving facility. Therefore, the project will not conflict or be inconsistent with CEQA Guidelines Section 15064.3 subdivision (b). No impacts are anticipated.

Cumulative Impacts: None
Mitigation Measures: None

c) **Less than Significant Impact.** The project site plan has been designed according to City of Indio standards. It provides an internal circulation system without sharp curves or dangerous intersections that is subject to review and approval by the City Traffic Engineer during standard City review processes. The project entry consists of two proposed access points. One is the located at the main entrance point on Indio Boulevard. An emergency access point is located at the southeast corner of the existing building adjacent to the project's western boundary.

d) **Less than Significant Impact.** These driveways have been designed to incorporate proper stacking, sight

distance and intersection control (e.g. left turn pockets) features. Automobiles would be the primary vehicle type generated by the project.

The project's pedestrian access points will be located with adequate visibility, and project-generated traffic will be consistent with existing traffic in the area. No roadway improvements are proposed as part of the project.

A Traffic Control Plan may be required as a condition of approval to be implemented throughout all construction activities. This plan will work to reduce potential impacts that may arise due to conflicts with construction traffic. Impacts will be less than significant.

The project is not anticipated to increase hazards due to geometric design feature or incompatible uses. Following the review and approval process at the City of Indio, impacts are less than significant without mitigation.

Cumulative Impacts: None
Mitigation Measures: None

e) **Less than Significant Impact.**

Emergency Access: Regional access to the project site will continue to be provided via primary arterials, secondary arterials and a variety of local roads.

Primary project access will be provided at the main entrance on Indio Boulevard and emergency access will be provided at a gate located near the southwest corner of the adjacent building along the site's western boundary. The project's pedestrian access points will be located with adequate visibility, and project-generated traffic will be consistent with existing traffic in the area. No roadway improvements are proposed as part of the project.

Prior to construction, both the Fire Department and Police Department will review the project site plan to ensure safety measures are addressed, including emergency access. The project is not anticipated to result in inadequate emergency access. Approval of the project is not anticipated to result in inadequate emergency access. Therefore, impacts are less than significant relative to inadequate emergency access.

Cumulative Impacts: None
Mitigation Measures: None

18. TRIBAL CULTURAL RESOURCES – Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
a) Would the project cause a substantial Adverse change in the significance of a Tribal cultural resource, defined in Public Resource Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size 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 Resource 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 Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American Tribe.	☐	☐	☐	☐

Sources: Cultural Report, Statistical Research Inc., 2022; Indio General Plan, 2019; Indio General Plan Environmental Impact Report, 2019.

a) i**. No Impact**. As previously discussed in the Cultural Resources Section, SRI conducted a project and site-specific study on historical and archaeological resources. The assessment included a records search, Tribal outreach, historical background research and an intensive-level field survey. The records search did not identify any known cultural resources within the project area, a large number of prehistoric archaeological sites are located within the surrounding 1 mile (1.6 km) and the project area has moderate sensitivity for buried prehistoric resources. Archival research identified possible historical-period structures and agricultural activity within the project area, suggesting that related historical-period archaeological deposits could be present just beneath the ground surface.

On April 18, 2022, SRI contacted the Native American Heritage Commission (NAHC) and requested a Sacred Lands File (SLF) search to identify the existence of California Native American traditional-use areas or sacred sites within and near the project area and to obtain a list of specific Native American groups or individuals who might have knowledge of California Native American resources in the study area. On May 20, 2022, the NAHC reported to SRI that the results of the SLF search were negative. However, the NAHC noted in its response that "the absence of specific site information in the SLF does not indicate the absence of cultural resources in any project area" (Torres-Fuentes 2022:1). In addition to these results, the NAHC identified 18 individuals from 12 groups that should be contacted as part of the Tribal outreach, which will be taken care of with AB 52.

The field survey identified that the surface of the project area has been heavily disturbed, and no indication of prehistoric or historical-period resources was noted. However, despite the observations made during survey that the surface of the project area is heavily disturbed, subsurface historical-period archaeological deposits related to the structure visible in historical aerial images, such as buried refuse deposits, irrigation features, and cisterns, may be present.

SRI recommends that an archaeological monitor be present for all ground-disturbing activities during construction of the self-storage facility. Therefore, less than significant impact are expected with the recommended mitigation measures identified as **CUL-1** in the Cultural Resources section of this Initial Study.

Cumulative Impacts: None
Mitigation Measures: **CUL-1**

b) ii**. Less than Significant Impact.** Public Resource Code 21074 identifies "Tribal Cultural Resources" as "sites, features, places, cultural landscapes, sacred places, and objects with culture value to California Native American Tribe" and that are either included or determined to be eligible for inclusion on the national, state, or local register of historic resources or that are determined by the lead agency, in its discretion, to be significant when taking into consideration the significance of the resource to a California Native American Tribe. To ensure that all significant Tribal Resources are identified and fully considered, the City of Indio initiated a 30-day government to government Tribal consultation period with local Tribes. The City received_____requests for consultation within the 30-day period. Any additional mitigation measures were not received within the required 30-day response period. TO BE COMPLETED After AB 52

Cumulative Impacts: None
Mitigation Measures:

19. **UTILITIES AND SERVICE SYSTEMS** – Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
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 reasonable foreseeable future development during normal, dry and multiple dry years?	☐	☐	☒	☐
c) Result in a determination by 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?	☐	☐	☐	☒

Sources: Indio General Plan, 2019; Indio General Plan Environmental Impact Report, 2019; 2020 Regional Urban Water Management Plan, Indio Water Authority.

a) **Less than Significant Impact.** Domestic water for the proposed project would be provided by Indio Water Authority (IWA). Wastewater services are provided by Valley Sanitary District. Water and sewer would be brought to the site through a series of sewer laterals. Electric power, telecommunications, and natural gas connections are also site adjacent. The project will be designed with a stormwater retention system that during the life of the project will comply with the City's drainage requirements by preventing site discharge and transport of untreated runoff. The proposed storm drain system includes facilities which have been preliminarily sized to provide enough storage for the 100-year controlling storm event. Therefore, no new construction or new water, wastewater, electric power, natural gas or telecommunications facilities will need to be constructed or relocated and no impacts are expected.

Cumulative Impacts: None
Mitigation Measures: None

b) **Less than Significant Impact.** Groundwater is the primary source of domestic water supply in the Coachella Valley. IWA is the potable water supplier in the City of Indio. The Indio Water Authority (IWA) was formed as a Joint Powers Authority in 2000, wholly owned by the City and Indio Redevelopment Agency, to be the legislative and policy entity responsible for delivering water to residents of the City for all municipal water programs and services. Since the establishment of IWA, service connections have increased from approximately 12,100 to over 23,000 active meter accounts, with the majority of the new growth occurring north of Interstate 10. In 2020, IWA supplied approximately 20,000 AF of water to businesses and residents. As one of the fastest growing municipal utilities in the Coachella Valley.

IWA extracts groundwater to meet the needs of its existing customer. The groundwater is drawn from the Indio Subbasin and is delivered to the service area via a pressurized distribution system of 326 miles of pipe supplied by 20 active wells. IWA's 2020 Regional Urban Water Management Plan (RUWMP) has been developed to assist the agency in reliably meeting current and future water demands in a cost-effective manner. The comprehensive Water Management Plan guides efforts to eliminate overdraft, prevent groundwater level decline, protect water quality, and prevent land subsidence.

IWA achieved its 2020 water use target but continues to implement demand management measures to reduce per capita water use. Per the 2020 RUWMP, CVWD anticipates that future development in the City is expected to use less water than existing development due to the mandated use of high efficiency plumbing fixtures under the CalGreen building standards and reduced landscape water use mandated by the City's Landscape Ordinance (54.054).

The proposed project would connect into the existing infrastructure adjacent to the site through on-site improvements of 6" water lines and will comply with the existing water management program in place. The addition of a storage facility is not expected to result in a subtantial increase to water supplies, since it would not result in an increase to the population and employees would be minimal. IWA's 2020 RUWMP projected demands are shown in Table 7-8 and new development is accounted for in CVWD;s project water use. The proposed project would generate less than 3,113 AFY of potable water.

Table 7-8. DWR 4-2R Projected Demands for Water

Use Type	Additional Description	Projected Water Use (AFY)				
		2025	2030	2035	2040	2045
Single Family		12,790	13,828	14,822	15,532	16,067
Multi-Family		1,875	1,985	2,135	2,303	2,553
Commercial / Industrial / Institutional		3,113	3,254	3,397	3,468	3,540
Landscape		5,752	6,171	6,590	6,934	7,277
Other		5	6	6	6	7
Losses		1,257	1,348	1,434	1,495	1,553
	Total	24,792	26,592	28,384	29,738	30,997

The City's Municipal Code has several ordinances in place to ensure water supply and efficiency measures are in place. Compliance with these ordinances will ensure that future development reduces water demand to meet target demands. The infrastructure and design components for the project will be consistent with IWA requirements and water management plan. The project will also be reviewed by IWA and City staff to assure compliance with all current and applicable requirements. The proposed development will be expected to implement water conservation measures to reduce impacts to public water supplies. Additionally, water installation and connection fees in place at the time of development will be collected by IWA. Therefore, no new infrastructure will be required as a result of project implementation and less than significant impacts are expected.

Cumulative Impacts: None

Mitigation Measures: None

c) **Less than Significant Impact.** Valley Sanitary District (VSD) provides wastewater collection and treatment and water reclamation services to an area of 12,768 acres, which includes a population of approximately 76,000, mainly serving the City of Indio. VSD operates and maintains 246 miles of sanitary sewer line and delivers over 6 million gallons per day (gpd) of wastewater to its 11 million gallons per day (mgd) wastewater treatment plant (WWTP) on Van Buren Street and Enterprise Way.

The proposed project would connect into the existing sewer main on Indio Boulevard and provide waste water services to the site through a series of private sewer laterals. The minor increase in sewer demand for the project would be treated by VSD WWTP and would be far below the current 11mgd treatment capacity of this plant. The project will undergo review by IWA and City staff to ensure wastewater capacity and compliance with the current wastewater treatment requirements. Additionally, sewer and water installation and connection fees in place at the time of development will be collected by IWA. No new or expanded treatment facilities are expected as a result of project implementation, or is the project expected to exceed wastewater capacity. Less than significant impacts are expected.

Cumulative Impacts: None
Mitigation Measures: None

d-e) Less than Significant Impact. The City of Indio has a franchise agreement with Burrtec Waste and Recycling Services to serve the solid waste disposal needs of the City, including this project site. Solid waste disposal and recycling services for the City of Palm Desert is provided by Burrtec. Solid waste and recycling collected from the proposed project will be hauled to the Edom Hill Transfer Station. Waste from this transfer station is then sent to a permitted landfill or recycling facility outside of the Coachella Valley. These include Badlands Disposal Site, El Sobrante Sanitary Landfill and Lamb Canyon Disposal Site. Cal-Recycle data indicates the Bandlands Disposal site has 7,800,000 cubic yards of remaining capacity, the El Sobrante Landfill has a remaining capacity of 3,884,470 tons of solid waste, and Lamb Canyon Disposal has a remaining solid waste capacity of 19,242,950 cubic yards. Using the residential solid waste generation factor of 0.41 tons per dwelling unit from the Riverside County EIR No. 521, the project could generate up 162.36 tons of solid waste. This generation overstates the project's actual waste efforts because it does not factor in the required solid waste reduction efforts required by the state.

As part of its long-range planning and management activities, the Riverside County Waste Management Department (RCWMD) ensures that Riverside County has a minimum of 15 years of capacity, at any time, for future landfill disposal. The 15-year projection of disposal capacity is prepared each year by as part of the annual reporting requirements for the Countywide Integrated Waste Management Plan. The most recent 15-year projection by the RCWMD indicates that no additional capacity is needed to dispose of countywide waste through 2024, with a remaining disposal capacity of 28,561,626 tons in the year 2024 (County of Riverside 2015b).

In addition, all future development would be required to comply with the mandatory commercial and multi-family recycling requirements of Assembly Bill 341. The project will comply with all applicable solid waste statutes, policies and guidelines. Therefore, less than significant impacts are expected relative to solid waste and applicable regulations.

Cumulative Impacts: None
Mitigation Measures: None

20. **WILDFIRE –** If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the Project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☒	☐
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water resources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☒	☐
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff post-fire slope instability, or drainage changes?	☐	☐	☒	☐

Sources: Indio General Plan, 2019; Indio General Plan Environmental Impact Report, 2019; CALFIRE Fire Hazard Severity Zone Maps.

a-d) **Less than Significant Impact**. The project site currently resides in an urban and developed area within the City of Indio. The project site has been graded and cleared of vegetation and is currently partially developed and partially vacant. Industrial properties are located west and east of the project site, and vacant land is located south of the project. According to CAL FIRE's Fire Hazard Severity Zones (FHSZ) in State Responsibility Areas (SRA) Map, the project site is not located in an SRA or located in an area classified as very high fire hazard severity zone. Per CAL FIRE's map, the project property is located in a (incorporated) Local Responsibility Area (LRA). The project is not located in or near state responsibility areas or lands classified as very high, high or moderate fire hazard severity zones, therefore, no impacts are anticipated.

Wildfire risk is related to a number of parameters, including fuel loading (vegetation), fire weather (winds, temperatures, humidity levels and fuel moisture contents), and topography (degree of slope). Steep slopes contribute to fire hazards by intensifying the effects of wind and making fire suppression difficult. Fuels such as grass are highly flammable because they have a high surface area to mass ratio and require less heat to reach the ignition point. According to the Riverside County General Plan, wildfire susceptibility is moderate to low in the valley and desert regions on the western and eastern sides of the Salton Sea. Methods in which developments address wildland fires hazards includes establishing setbacks that buffer development from hazard areas, maintaining brush clearance to reduce potential fuel, use of low fuel landscaping, and use of fire-resistant building techniques.

As previously stated, the project property is located in a developed area of the City. Thick vegetation, which acts as wildfire fuel, does not occur in areas adjacent to the project. Additionally, the project is not located adjacent to steep slopes. The project site will be developed to the most current California building standards and fire code. Therefore, a wildfire is not expected to occur in the City and at the project site. As a result, the project site is not expected to expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire.

The project will connect to existing water and sewer infrastructure. The proposed infrastructure would allow for a decrease of fire risk during operation of the project. The development of this infrastructure will not exacerbate fire risk or result in short- or long-term impacts to the environment. The project site will be

connecting to an existing network of streets. The project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. The project is not expected to require the installation or maintenance of associated infrastructure that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment.

Landslides include rockfalls, deep slope failure, and shallow slope failure. Factors such as the geological conditions, drainage, slope, vegetation, and others affect the potential for landslides. One of the most common causes of landslides is construction activity that is associated with road building. The site is located on flat ground, therefore, risks associated with slope instability are not significant. As a result, the project is not expected to expose people or structures to significant risks including downslope or downstream flooding or landslides, due to runoff, post-fire slope instability, or drainage changes. No impact is expected to result from the project. Overall, less than significant impacts are anticipated.

Cumulative Impacts: None
Mitigation Measures: None

21. **MANDATORY FINDINGS OF SIGNIFICANCE**	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☒	☐	☐
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	☐	☐	☒	☐
c) Does the project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	☒	☐

a) **Less than Significant Impact with Mitigation Incorporated.** As concluded in the Biological and Cultural Resources sections of this document, the proposed project would not result in "no impacts", "less than significant impacts", or "less than significant impact with mitigation incorporated" to these resources. The project is compatible with the City of Indio General Plan, Zoning and the surrounding vicinity. The project will not significantly degrade the overall quality of the region's environment, or substantially reduce the habitat of a wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory. Based upon the information and mitigation measures provided within this Initial Study, approval and implementation of the project is not expected to substantially alter or degrade the quality of the environment, including biological, cultural or historical resources. Less than significant impacts are expected.

Cumulative Impacts: None
Mitigation Measures: See the Biological Resources and Cultural Resources Section.

b) **Less than Significant Impact:** The proposed project and its location is found to be adequate and consistent with existing federal, state and local policies and is a consistent land use with the City of Indio General Plan and Zoning. Approval and implementation of the proposed project will result in less than significant impacts related to cumulatively considerable impacts.

Cumulative Impacts: None
Mitigation Measures: None

c) **Less than Significant Impact.** The proposed project will not result in impacts related to environmental effects that will cause substantial adverse effects on human beings. The City's review process will ensure that all applicable guidelines and standards are followed. Based upon the findings provided in this document, and

mitigation measures and standard conditions incorporated into the project, less than significant impacts are expected.

Cumulative Impacts: None
Mitigation Measures: See previous sections.