INITIAL STUDY

FOR THE

MISSION SPRINGS WATER DISTRICT
RES-BCT AND REGIONAL WATER RECLAMATION FACILITY SOLAR DEVELOPMENT PROJECT

Prepared for:

Mission Springs Water District
66575 Second Street
Desert Hot Springs, CA 92240

Prepared by:

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September 2025

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LIST OF ABBREVIATIONS AND ACROYNMS

°F	Fahrenheit
AAQS	Ambient Air Quality Standards
AB	Assembly Bill
ACBCI	Agua Caliente Band of Cahuilla Indians
AF	acre feet
AF	Acre Feet
AFY	acre feet per year
AKA	also known as
amsl	above mean sea level
APE	Area of Potential Effect
APN	Assessor's Parcel Number
AQMD	Air Quality Management District
AQMP	Air Quality Management Plan
ARB	Air Resources Board
ASTM	American Society for Testing and Materials
BACMs	Best Available Control Measures
bgs	belowground surface
BMPs	Best Management Practices
BPELS	Building and Professions Code Sections
BRA	Biological Resources Assessment
BUOW	Burrowing Owl
C	Commercial
C-BP	Commercial Business Park
C-H	Commercial Highway
C&D	construction and demolition
C_2Cl_4	perchloroethylene
C_2H_4O	acetaldehyde
C_4H_6	1,3-butadiene
C_6H_6	benzene
CAA	Clean Air Act
CAAA	Clean Air Act Amendment
CAAQS	California Ambient Air Quality Standards
CAL FIRE	California Department of Forestry and Fire Protection
CalEEMod	California Emissions Estimator Model
CALGreen	California Green Building Standards Code
CAP	Climate Action Plan
CAPCOA	California Air Pollution Control Officers Association
CARB	California Air Resources Board
CBC	California Building Code
CCAR	California Climate Action Registry
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CH_2O	formaldehyde
CH_4	methane
CHRIS	California Historical Resources Information System

CNEL	Community Noise Equivalent Level
CNPS	California Native Plant Society
CO	Carbon Monoxide
CO_2	carbon dioxide
COA	Conditions of Approval
COCs	constituents of concern
Corps	U.S. Army Corps of Engineers
CRECs	controlled recognized environmental conditions
CRHR	California Register of Historical Resources
CRMP	Cultural Resource Management Plan
CVMSHCP	Coachella Valley Multiple Species Habitat Conservation Plan
CVWD	Coachella Valley Water District
CWA	Clean Water Act
CY	cubic yard
dB	decibel
dBA	A-weighted decibel
DDW	Division of Drinking Water
DPM	diesel particulate matter
DTSC	Department of Toxic Substance Control
DWA	Desert Water Agency
DWR	Department of Water Resources
EAP	Energy Action Plan
EIR	Environmental Impact Report
EO	Executive Orders
EPA	Environmental Protection Agency
ESA	Environmental Site Assessment
FE	Federally Endangered
FEMA	Federal Emergency Management Agency
FGC	Fish & Game Code
FHSZ	Fire Hazard Severity Zone
FIRM	Flood Insurance Rate Maps
FT	Federal Threatened
FTA	Federal Transit Association
GCC	Global Climate Change
GHG	Greenhouse Gas
gpm	gallons per minute
GSA	Groundwater Sustainability Agencies
GSP	Groundwater Sustainability Plans
HCP	Habitat Conservation Plan
HFCs	hydrofluorocarbons
hP	horse power
HREC	historical recognized environmental conditions
HSA	Hydrologic Sub-Area
HSC	Health and Safety Code
I	Industrial
I-10	Interstate 10
I-L	Industrial Light

in/sec	inches per second
IWA	Indio Water Authority
km	kilometers
kWh	kilowatt hour
lbs./day	Pounds Per Day
Leq	equivalent continuous sound level
LF	lineal feet
LRA	Local Responsibility Area
LSA	Lake or Streambed Alteration
LST	Localized Significance Thresholds
LUCI	Governor's Office of Land Use and Climate Innovation
LUST	Leaking Underground Storage Tank
MBTA	Migratory Bird Treaty Act
MCL	maximum contamination level
MLD	Most Likely Descendant
MM	Mitigation Measure
MND	Mitigated Negative Declaration
MRZ	Mineral Resource Zone
MSHCP	Multi-Species Habitat Conservation Plan
MSWD	Mission Springs Water District
MT	Metric Ton
$MTCO_2e/yr$	Metric Tons of CO_2 equivalent per year
N_2O	nitrous oxide
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission
NBP	Nesting Bird Plan
NCCP	Natural Community Conservation Plan
No.	Number
NO2 or NOx	Nitrogen Dioxide
NOI	Notice of Intent
NPDES	National Pollutant Discharge Elimination System
NRCS	National Resource Conservation Service
NWI	National Wetlands Inventory
O3	Ozone
OPR	Governor's Office of Planning and Research
OS	Open Space
Pb	Lead
PFCs	perfluorocarbons
PM 10	Fine Particulate Matter
PM 2.5	Fine Particulate Matter
ppm	parts per million
PPV	peak particle velocity
PRC	Public Resource Code
PV	Photovoltaic
R	Refrigerants
R-RD	Residential Rural Desert
RCFD	Riverside County Fire Department

RECs	recognized environmental conditions
ROG	reactive organic gases
ROW	Rights-of-Way
RTP/SCS	Regional Transportation Plan/Sustainable Communities Strategy
RWQCB	Colorado River Basin Regional Water Quality Control Board
RWRF	Regional Wastewater Reclamation Facility
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCCIC	South Central Coastal Information Center
SCE	Southern California Edison
SEAs	Significant Ecological Areas
SF_6	sulfur hexafluoride
SGMA	Sustainable Groundwater Management Act
SGMP	Sustainable Groundwater Management Plan
SLF	Sacred Land File
SO2	Sulfur Dioxide
SOI	Secretary of Interior
SWPPP	Storm Water Pollution Prevention Plan
SWRCB	State Water Resources Control Board
TAC	Toxic Air Contaminants
TCR	Tribal Cultural Resources
TGA	Trip Generation Assessment
THPO	Tribal Historic Preservation Office
USACE	United States Army Corps of Engineers
USDA	U.S. Department of Agriculture
USEPA	U.S. Environmental Protection Agency
USFWS	U.S. Fish and Wildlife Service
USGS	U.S. Geological Survey
UWMP	Urban Water Management Plan
VdB	vibration-velocity decibel
VES	Vapor Encroachment Screen
VMT	vehicle miles traveled
VOCs	Volatile Organic Compounds
vph	vehicles per hour
WOTUS	Waters of the United States
WQMP	Water Quality Management Plan
ZNE	Zero Net Energy

ENVIRONMENTAL CHECKLIST

Project Title	RES-BCT and Regional Water Reclamation Facility Solar Development Project
Lead Agency Name	Mission Springs Water District
Address	66575 Second Street, Desert Hot Springs, CA 92240
Contact Person	Danny Friend, Director of Operations
Phone Number	(760) 329-6448
Email	dfriend@mswd.org

Project Location

The Mission Springs Water District (MSWD or District) service area is located in southern California within the northwestern portion of the Coachella Valley. The project will occur within several parcels owned by the District along Little Morongo Road, at and just north of the Nancy Wright Regional Water Reclamation Facility (RWRF). The project is generally located at 19011 Little Morongo Road, Desert Hot Springs, CA 92240, and surrounds the existing photovoltaic system owned by the District. The project is located within the USGS Topo 7.5-minute map for Desert Hot Springs, CA, and is located in Section 14, Township 3 South and Range 4 East. The approximate GPS coordinates of the project area are 33.911291°, -116.528833°. Refer to **Figures 1 and 2** for the regional and site location maps.

Project Sponsor Name	Mission Springs Water District
Address	66575 Second Street, Desert Hot Springs, CA 92240
Land Use Designation	Industrial (Industrial Cannabis Overlay)
Zoning Classification	Industrial Light (I-L) (Industrial Cannabis Overlay)

Project Description

Introduction

Mission Springs Water District (MSWD or District) provides water and sewer services to the communities of Desert Hot Springs, West Garnet, North Palm Springs, and various portions of unincorporated Riverside County. In August of 2019, MSWD certified the Environmental Impact Report (EIR) for the West Valley Water Reclamation Program, which consisted of constructing municipal wastewater collection and treatment systems that would facilitate the elimination of individual septic systems that overlie the Mission Creek aquifer. The West Valley Water Reclamation Program consisted of three components: construction of a wastewater treatment plant (the Nancy Wright Regional Wastewater Reclamation Facility [Nancy Wright RWRF]), construction of a conveyance system connection existing sewered areas to the Nancy Wright RWRF, and construction a collection system for the GQPP Area M2 (to be served by the Nancy

Wright RWRF, and construction a collection system for the GQPP Area M2 (to be served by the Nancy Wright RWRF). As part of the District's continued development of the Wright RWRF, the District has determined that its operations would be best served with expanded solar generation to the north of the Nancy Wright RWRF site. Thus, the District will serve as the California Environmental Quality Act (CEQA) lead agency for the proposed project, which would involve installation of ground mounted solar to the north and west of the existing solar plant located at the northwest intersection of 19th Avenue and Little Morongo Road. The proposed project plans are illustrated on **Figures 3 and 6**.

Existing Setting

The proposed project is located in a relatively undeveloped portion of the City of Desert Hot Springs, with the project site consisting of disturbed Sonoran mixed woody and succulent scrub habitat. At present, the sites within which the solar will be installed are vacant, with MSWD's existing solar plant located to the south of the RES-BCT solar system site, and east of the Nancy Wright RWRF solar site.

Project Description

The proposed project would install ground mounted solar (also termed photovoltaic) systems at to the north and west of the existing solar plant located at the northwest intersection of 19th Avenue and Little Morongo Road.

The first photovoltaic system would be installed in support of the existing RES-BCT site (north of the existing photovoltaic system along Little Morongo Road) and would be sized at 3,585 kilowatts (kW) (the system's Direct Current [DC] system rating). Refer to **Figures 3 and 4**, which portray the plans for the site. This system will be interconnected to the electrical utility grid per the requirements of the utility company and all applicable local, state, and federal codes. The photovoltaic installation at this property would include the installation of 5,736 modules, which are each 97.01" x 44.65" x 1.38" in size. The RES-BCT solar system will include the installation of 9 inverters with a total output of 3,150 kW AC. The DC design will be based on a 1,500 Volt DC that would accommodate the 2% average highest temperature (44° Celsius) and the extreme minimum (3° Celsius). The RES-BCT solar system would be configured in 31 rows with 4 columns of photovoltaic panels. The area within which the RES-BCT solar system would be installed within a fence with an area of 9.82 acres, while the solar array would cover about 8.55 acres within the site. Development of the RES-BCT solar system site includes a setback of 20' at the western, northern, and easter site boundary, and 27' at the southern site boundary. Inverters would be installed in the center of the site. An AC combiner panel, and transformer would be installed at the central eastern portion of the site. The access point to the site would be along Little Morongo Road at the central eastern portion of the site near the transformer. The project would also install medium voltage primary service line to the existing power pole across the street along Little Morongo Road (east of the project site) from the transformer that would be installed within the project site. The length of the medium voltage primary service line is 60 lineal feet (LF) with a trench width of 24", and depth of 34". The whole of the project site would be fenced.

The second photovoltaic system would be installed in support of the Nancy Wright RWRF site (west of the existing photovoltaic system along 19th Avenue), and would be sized at 309.24 kW (the system's DC system rating). Refer to **Figures 5, 6, and 7**, which portray the plans for the site. This system will be interconnected to the electrical utility grid per the requirements of the utility company and all applicable

local, state, and federal codes. The photovoltaic installation at this property would include the installation of 648 modules, which are each 93.86" x 44.65" x 1.18" in size. The Nancy Wright RWRF solar system will include the installation of 5 inverters with a total output of 300 kW AC. The DC design will be based on a 1,000 Volt DC that would accommodate the 2% average highest temperature (44° Celsius) and the extreme minimum (3° Celsius). The Nancy Wright RWRF solar system would be configured in 16 rows of photovoltaic panels containing between 50 and 98 individual modules within each individual row. The area within which the Nancy Wright RWRF solar system would be installed is about 15,456 square feet (SF) or the equivalent of about 0.355 acres. Development of the Nancy Wright RWRF solar system site includes a setback of 20'4" at the western site boundary, 22'10" at the eastern site boundary, with a 20-foot setback at the northern and southern site boundaries. Inverters would be installed along the eastern portion of several rows. An AC combiner panel, and transformer would be installed at the southeastern corner of the site. The access point to the site would be along 19th Avenue at the southwestern corner of the site. The project would also install 183'7" transmission line to the line side tap in the main service panel (4,000 amps, 480 volts), AC disconnect, and 400 KVA (1,000 volt-amps) transformer within the Nancy Wright RWRF site to the south of the project site. The length of the medium voltage primary service line is 1,641.83 lineal feet (LF) with a trench width of 24", and depth of 34". The whole of the project site would be fenced.

The general layout of the solar facilities may be slightly modified in the future as actual development occurs, but the proposed project will remain within the footprint shown on **Figures 3 through 7**.

Construction Scenario

Construction is anticipated to begin in Quarter 4 2025 and conclude in the second quarter of 2026. Please identify which of the following construction activities will be implemented during construction of your project with a short description of how long a phase is scheduled to occur; type of equipment used; and number of employees onsite.

The project would require clearing and grubbing for two to three days for each site. The project would prepare subgrade for one to two days for each site. No mass grading and no soil import or export is anticipated to be required. The proposed project would install stormwater management within each site to control runoff, which would require about one day of construction. The project would require some trenching for the medium voltage primary line, which would require about one day at the RES-BCT site, and two days at the Nancy Wright RWRF. Trenching at the Nancy Wright RWRF will be carried out utilizing a backhoe for both native and RWRF footprint; construction will require asphalt removal and replacement in areas that are already developed within the RWRF footprint. The installation of the ground mounted solar, transformers, and other appurtenances would require about one and a half month for the RES-BCT site, and less than a month for the RWRF site. The project will not install any landscaping. The sites will be fenced, and fencing installation will require about four days to install at each site. The final electrical system would require about seven days to install.

All construction equipment, material and employees will access the project site from either 19th Avenue or Little Morongo Road. The maximum number of employees on the site at any one time is estimated to be 10 persons and the maximum number of truck deliveries of equipment and material will be 3 trucks per day. The construction equipment that is anticipated to be used is as follows: a skip loader or grader to grub and crew trucks to transport workers and tools; a backhoe to dig the trenches; a street saw to cut out

existing asphalt at the RWRF; a dump truck to transport demo asphalt and front-end loader to load truck; a dump truck to deliver new asphalt and small roller to compact.

Operational Scenario

The photovoltaic systems at the Nancy Wright RWRF and RES-BCT would generate a combined 3.97 MW of electricity per day. Periodic maintenance of the solar facilities will occur. This includes washing the panels by hand or using cleaning robots.

Surrounding land uses and setting:

The proposed project is located in a relatively undeveloped portion of the City of Desert Hot Springs, with the surrounding area consisting of disturbed Sonoran mixed woody and succulent scrub habitat. Mission Creek is also to the east of Little Morongo Road, and the Nancy Wright RWRF construction was completed in February 2025 and is south of the Nancy Wright RWRF solar system site. The land uses surrounding the project site are shown in Table 1, below.

Table 1: Surrounding Land Uses

Location	Existing Land Use	Land Use Category	Zoning Classification
North	Vacant	Industrial (I)(Cannabis Overlay)	Industrial Light (I-L)
South	Nancy Wright RWRF	Industrial (I)(Cannabis Overlay)	Industrial Light (I-L)
East	Vacant / Mission Creek	Open Space (OS)	OS-C: Open Space Conservation
West	Vacant	Industrial (I)(Cannabis Overlay)	Industrial Light (I-L)

Other agencies whose approval is required (e.g., permits, financing approval, or participation agreement.)

Implementation of the proposed project may require a variety of approvals from other agencies. This section summarizes agency approvals that have been identified to date. This list may be expanded as the environmental review proceeds.

- Notice of Intent (NOI) to the State Water Resources Control Board (SWRCB) for a NPDES general construction stormwater discharge permit. This permit is granted by submittal of an NOI to the SWRCB, but is enforced through a Storm Water Pollution Prevention Plan (SWPPP) that identifies construction best management practices (BMPs) for the site. In the project area, the Colorado River Basin Regional Water Quality Control Board enforces the BMP requirements described in the NPDES permit by ensuring construction activities adequately implement a SWPPP. Implementation of the SWPPP is carried out by the construction contractor, with the Regional Board and county providing enforcement oversight.
- If listed species are involved, the U.S. Fish and Wildlife Service and/or California Department of Fish and Wildlife (CDFW) may have to issue incidental take permits or permits may be obtained under the Multi-Species Habitat Conservation Plan (MSHCP).
- The Corps of Engineers, CDFW and Colorado River Basin Regional Water Quality Control Board

Assembly Bill 52 Consultation

Have California Native American tribes traditionally and cultural affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, has consultation begun?[1]

AB 52 consultation letters were sent on July 9, 2025 to the only tribe that has requested construction from the District: Agua Caliente Band of Cahuilla Indians. The Tribe responded on July 23, 2025 requesting several items:

- *Tribal Monitoring during construction as cultural resources have been noted in the surrounding area.*
- *AB-52 Consultation*
- *Final Reports and site records*

The District has included mitigation measures to address these requests, and has provided or will provide the requested materials to the Tribe.

[1] Note: Conducting consultation early in the CEQA process allows tribal governments, lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process. (See Public Resources Code section 21083.3.2.) Information may also be available from the California Native American Heritage Commission's Sacred Lands File per Public Resources Code section 5097.96 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that Public Resources Code section 21082.3(c) contains provisions specific to confidentiality.

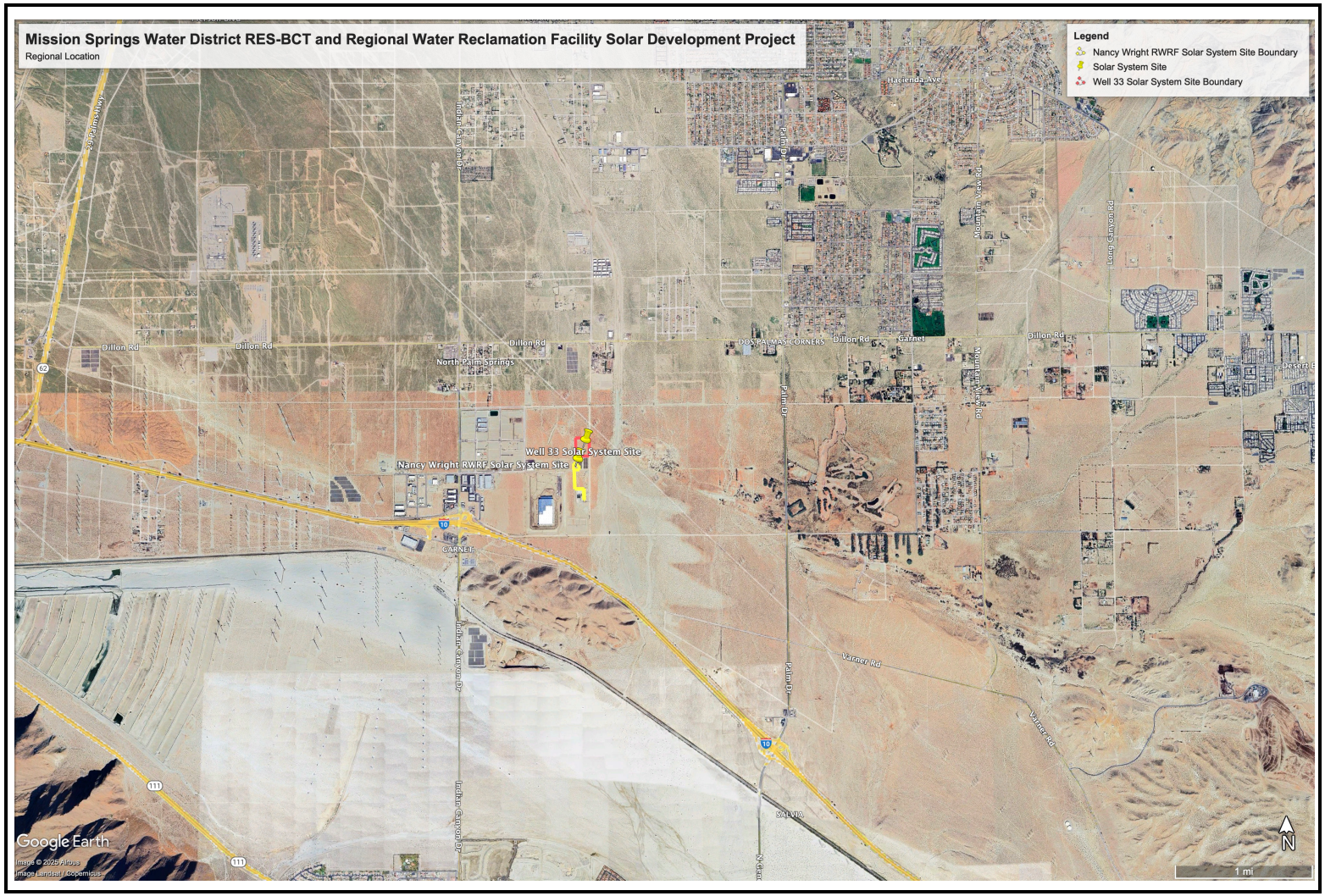


FIGURE 1

Tom Dodson & Associates
Environmental Consultants

Regional Project Location

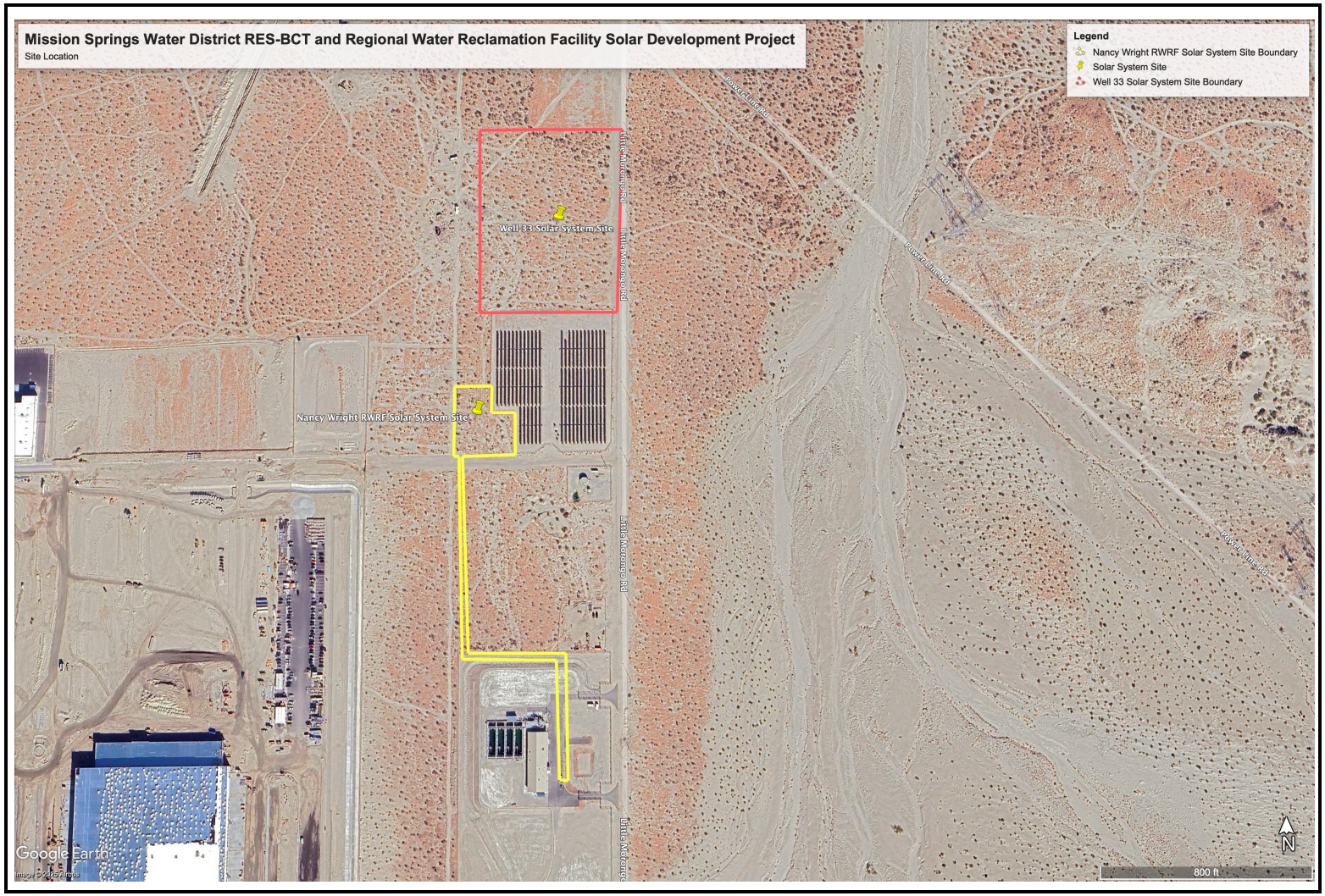
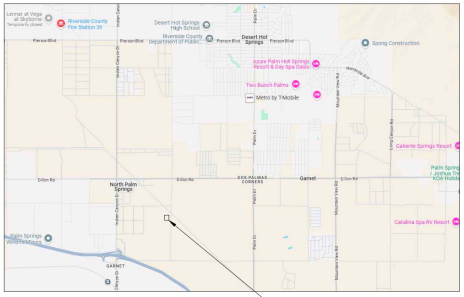


FIGURE 2

Tom Dodson & Associates
Environmental Consultants

Site Location

3585 kW Ground Mount Photovoltaic System
18995 Little Morongo Road, Desert Hot Springs, CA 92240



1 VICINITY MAP

Scale: NTS

2 AERIAL VIEW

Scale: NTS

LIST OF DRAWINGS / DOCUMENTS

DRAWINGS:

1.	COVER SHEET	E-1
2.	SITE PLAN	E-2
3.	STRING LAYOUT	E-2A
4.	SINGLE LINE DIAGRAM	E-3
5.	ELECTRICAL CALCULATION &LABELS	E-4
6.	LEGENDS & GEN. NOTES	E-5
7.	ELECTRICAL DETAILS	E-6,6A,
8.	FENCE DETAILS	E-6B,
9.	DATA SHEETS	DS-1,2

ENGINEER OF RECORD-

STATEN SOLAR CORPORATION
175 NORTECH PARKWAY
SAN JOSE, CA 95134
(408) 780-2889

AHJ -
MISSION SPRINGS WATER DISTRICT
66575 SECOND STREET DESERT HOT SPRINGS, CA 92240

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LICENSE NO.- 984910
LICENSE CLASSIFICATION - C46
LICENSE CLASSIFICATION - B
LICENSE CLASSIFICATION - C10

PROJECT INFORMATION

SCOPE OF WORK:

THE PROJECT IS TO INSTALL A GROUND MOUNTED PHOTOVOLTAIC SYSTEM AND ALL ASSOCIATED POWER EQUIPMENT AT A COMMERCIAL PROPERTY.

SYSTEM WILL BE INTERCONNECTED TO THE ELECTRICAL UTILITY GRID PER THE REQUIREMENTS OF THE UTILITY COMPANY AND ALL APPLICABLE LOCAL AND NATIONAL CODES.

SYSTEM SPECIFICATIONS

MODULES -	HELIENE 625W
TOTAL MODULE COUNT	5736
NOMINAL POWER	625W
TOTAL DC SYSTEM RATING	3585 kW DC
INVERTER -	(9) SUNGROW 350KW (SG350HX-US)
TOTAL INVERTER COUNT	9
TOTAL INVERTER OUTPUT	3150 kW AC
MOUNTING TYPE	SINGLE-ROW, HORIZONTAL, BALANCED, SINGLE-AXIS
TRACKER MANUFACTURER	OMCO SOLAR
TILT ANGLE	+60°/-60°

DESIGN CRITERIA

DC DESIGN WILL BE BASED ON A 1500V DC. ASHRAE DATA AVAILABLE FOR PALM SPRINGS INTL IS AS FOLLOWS:

- 2% AVERAGE HIGHEST TEMP = 111.2°F
- EXTREME MINIMUM = 37.4°F

APPLICABLE CODES

.

- 2022 CALIFORNIA BUILDING CODE
- 2022 CALIFORNIA RESIDENTIAL CODE
- 2022 CALIFORNIA MECHANICAL CODE
- 2022 CALIFORNIA PLUMBING CODE
- 2022 CALIFORNIA ELECTRICAL CODE
- 2022 CALIFORNIA GREEN BUILDING CODE
- 2022 CALIFORNIA ENERGY CODE
- 2022 CALIFORNIA FIRE CODE

NOTES:

- MODULES TILT - +60°/-60° SINGLE AXIS TRACKERS
- MOUNTING TYPE- GROUND MOUNTED
- SOLAR ARRAY FOOTPRINT: 440600 SQ. FT
- APN: 666360007

MSWD RES-BCT
Cover Sheet
3585 kW Ground Mount Project
(5736) Heliene 625W Modules
18995 Little Morongo Rd.
Desert Hot Springs, CA 92240

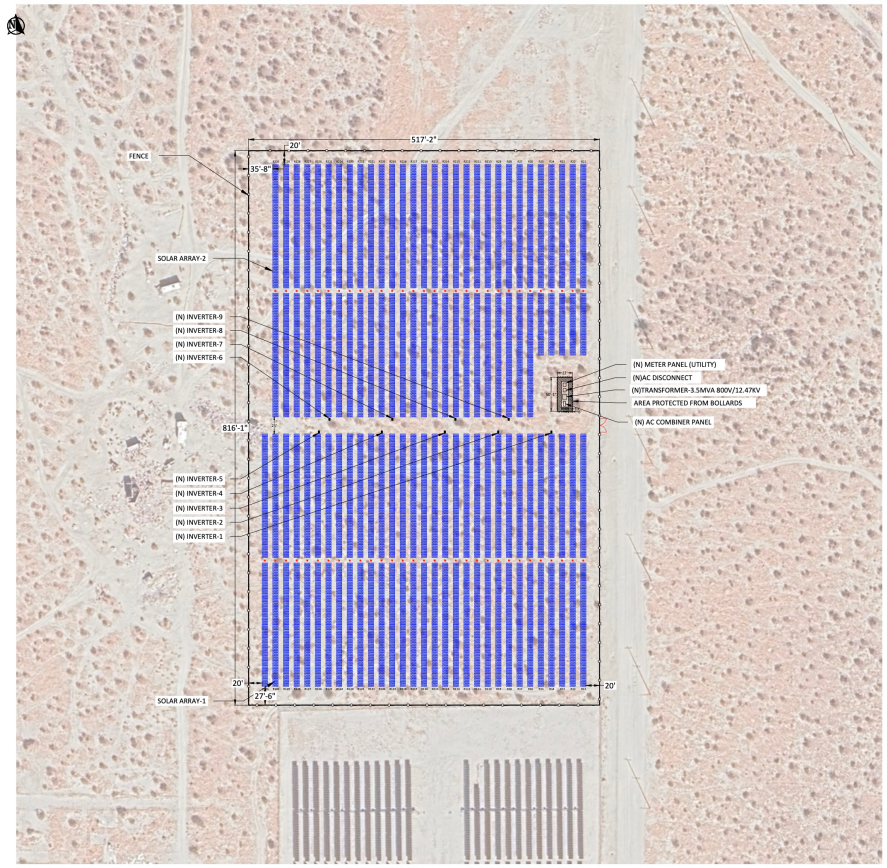
STATEN

DWG NO: E-1
PROJ NO: LMR-190

FIGURE 3

Tom Dodson & Associates
Environmental Consultants

Well 33 RES-BCT Solar System Plan Detail



1 ARRAY LAYOUT

Scale: 1/64"= 1'-0"

GENERAL NOTES

1. (5736) HELIENE 625W MODULES.
2. (9) 350KW SUNGROW INVERTERS
3. ALL MECHANICAL AND ELECTRICAL EQUIPMENT SHALL BE LISTED AND APPROVED BY A TESTING AGENCY RECOGNIZED BY THE AHJ ANY EQUIPMENT NOT LISTED SHALL BE TESTED AND CERTIFIED BY AN APPROVED TESTING AGENCY.
4. COMPLIANCE WITH 2022 CALIFORNIA FIRE CODE.
5. DRAWINGS ARE DIAGRAMMATIC IN NATURE AND CANNOT SHOW EVERY CONNECTION, JUNCTION BOX, WIRE, CONDUIT, ETC. THE CONTRACTOR SHALL BE RESPONSIBLE FOR PROVIDING A COMPLETE AND FUNCTIONAL ELECTRICAL SYSTEM
6. PANEL DESIGNATIONS SHOWN ON THESE DRAWINGS ARE GIVEN FOR CLARIFICATION OF CIRCUITING ONLY AND MAY NOT CORRESPOND TO THE DESIGNATION FOUND IN THE FIELD.
7. ALL EXISTING CONDUIT RUNS ARE NOT SHOWN.CONTRACTOR SHALL VERIFY EXISTING CONDUIT LOCATIONS IN FIELD.
8. THE SOLAR MODULES SHALL BE TILTED +60°/-60° SINGLE AXIS TRACKERS AT GROUND .
9. THE WORKING CLEARANCES AROUND THE EXISTING ELECTRICAL EQUIPMENT AS WELL AS THE NEW ELECTRICAL EQUIPMENT WILL BE MAINTAINED IN ACCORDANCE WITH NEC 110.26.

MODULES COUNT AND RATING PER ARRAY

ARRAY	TYPE	MODULES TYPE	MODULES DIMENSIONS	MODULE RATING	AZIMUTH	TILT	MODULES	KWDC
ARRAY 1	GROUND MOUNTED	HELIENE 625W, HSPE-156HC-M10-625W	97.01" x 44.65" x 1.38"	625W	SINGLE AXIS TRACKERS	60°/-60°	2976	1860
ARRAY 2	GROUND MOUNTED	HELIENE 625W, HSPE-156HC-M10-625W	97.01" x 44.65" x 1.38"	625W	SINGLE AXIS TRACKERS	60°/-60°	2760	1725
TOTAL							5736	3585

MSWD RES-BCT
Array Layout
3585 kW Ground Mount Project
(5736) Heliene 625W Modules
18995 Little Morongo Rd.
Desert Hot Springs, CA 92240

NAME OF CUSTOMER: MSWD RES-BCT
TITLE: Array Layout
SUBJECT: 3585 kW Ground Mount Project (5736) Heliene 625W Modules
PROJECT LOCATION: 18995 Little Morongo Rd. Desert Hot Springs, CA 92240

REV#	DATE	DESCRIPTION	DRAWN	CHECKED	APPROVED
0	06-02-2025	30% SUBMITTAL	DEEPAK	PUNEET	DIVY
0	11-15-2024	INITIAL SUBMITTAL	DEEPAK	PUNEET	DIVY

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DWG NO: E-2
PROJ NO: LMR-190

FIGURE 4

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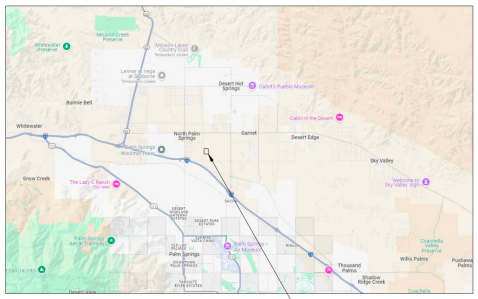
Environmental Consultant

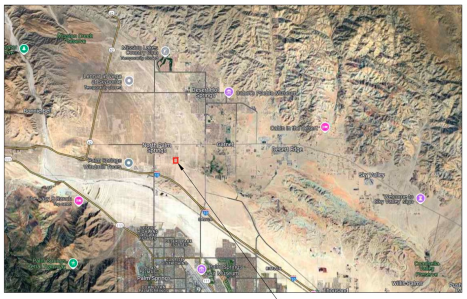
Well 33 RES-BCT Solar System Site Plan

387.2 kW Ground Mount Photovoltaic System
19011 Little Morongo Rd, Desert Hot Springs, CA 92240



1 VICINITY MAP

Scale: NTS



2 AERIAL VIEW

Scale: NTS

LIST OF DRAWINGS / DOCUMENTS

DRAWINGS:

1.	COVER SHEET	E-1
2.	SITE PLAN	E-2
3.	SINGLE LINE DIAGRAM	E-3
4.	ELECTRICAL CALCULATION &LABELS	E-4
5.	LEGENDS & GEN. NOTES	E-5
6.	DETAILS	E-6,6A,6B
7.	DATA SHEETS	E-7

GENERAL CONTRACTOR & ELECTRICAL ENGINEERING

STATEN SOLAR CORPORATION
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SAN JOSE, CA 95134
(408) 780-2889
WWW.STATENSOLAR.COM

LICENSE NO.- 984910
LICENSE CLASSIFICATION - C46

PROJECT INFORMATION

SCOPE OF WORK:

THE PROJECT IS TO INSTALL A GROUND MOUNTED PHOTOVOLTAIC SYSTEM AND ALL ASSOCIATED POWER EQUIPMENT AT A COMMERCIAL PROPERTY.

SYSTEM WILL BE INTERCONNECTED TO THE ELECTRICAL UTILITY GRID PER THE REQUIREMENTS OF THE UTILITY COMPANY AND ALL APPLICABLE LOCAL AND NATIONAL CODES.

SYSTEM SPECIFICATIONS

MODULES -	TRINA 605W
TOTAL MODULE COUNT	640
NOMINAL POWER	605W
TOTAL DC SYSTEM RATING	387.2 kW DC
INVERTER -	(5) CPS 60KW (CPS-SCH 60KTL-DO/US-480)
TOTAL INVERTER COUNT	5
TOTAL INVERTER OUTPUT	300 kW AC

DESIGN CRITERIA

DC DESIGN WILL BE BASED ON A 1000V DC. ASHRAE DATA AVAILABLE FOR PALM SPRINGS INTL IS AS FOLLOWS:

- 2% AVERAGE HIGHEST TEMP = 44°C
- EXTREME MINIMUM = 3°C

APPLICABLE CODES

.

- 2022 CALIFORNIA BUILDING CODE
- 2022 CALIFORNIA RESIDENTIAL CODE
- 2022 CALIFORNIA MECHANICAL CODE
- 2022 CALIFORNIA PLUMBING CODE
- 2022 CALIFORNIA ELECTRICAL CODE
- 2022 CALIFORNIA GREEN BUILDING CODE
- 2022 CALIFORNIA ENERGY CODE
- 2022 CALIFORNIA FIRE CODE

NOTES:

- MODULES TILT - 20°
- MOUNTING TYPE- GROUND MOUNTED
- SOLAR ARRAY FOOTPRINT: 32002 SQ. FT
- APN: 656050007

NWRWF
Cover Sheet
387.2 kW Ground Mount Project
(640) TRINA 605W Modules
19011 Little Morongo Rd,
Desert Hot Springs, CA 92240

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San Jose, CA 95134
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License No.: 984910| C-46

DWG NO.: E-1
PROJ NO.: LMR-190

FIGURE 5

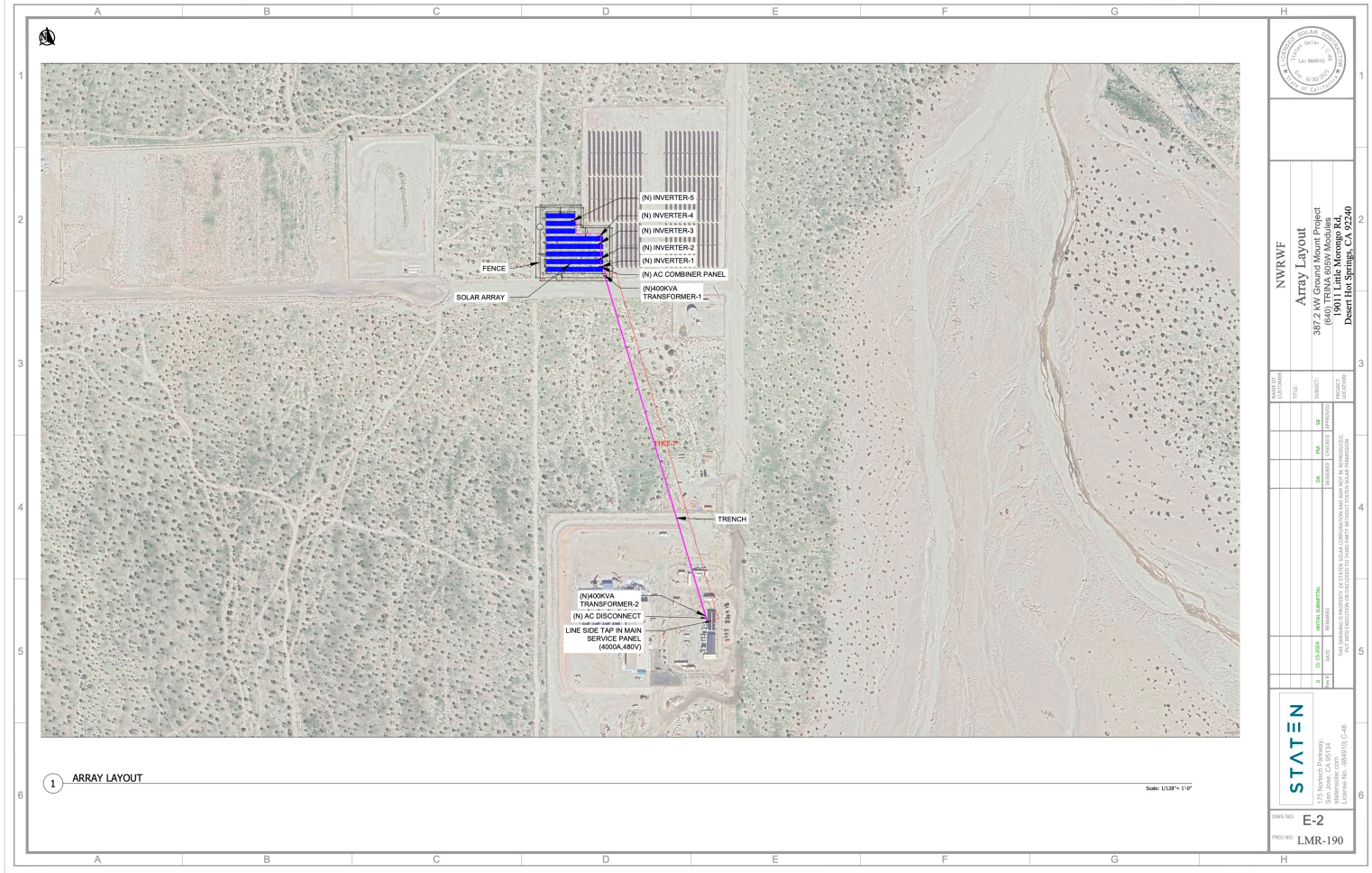

FIGURE 6

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Nancy Wright RWRF Solar System Site Plan Overview

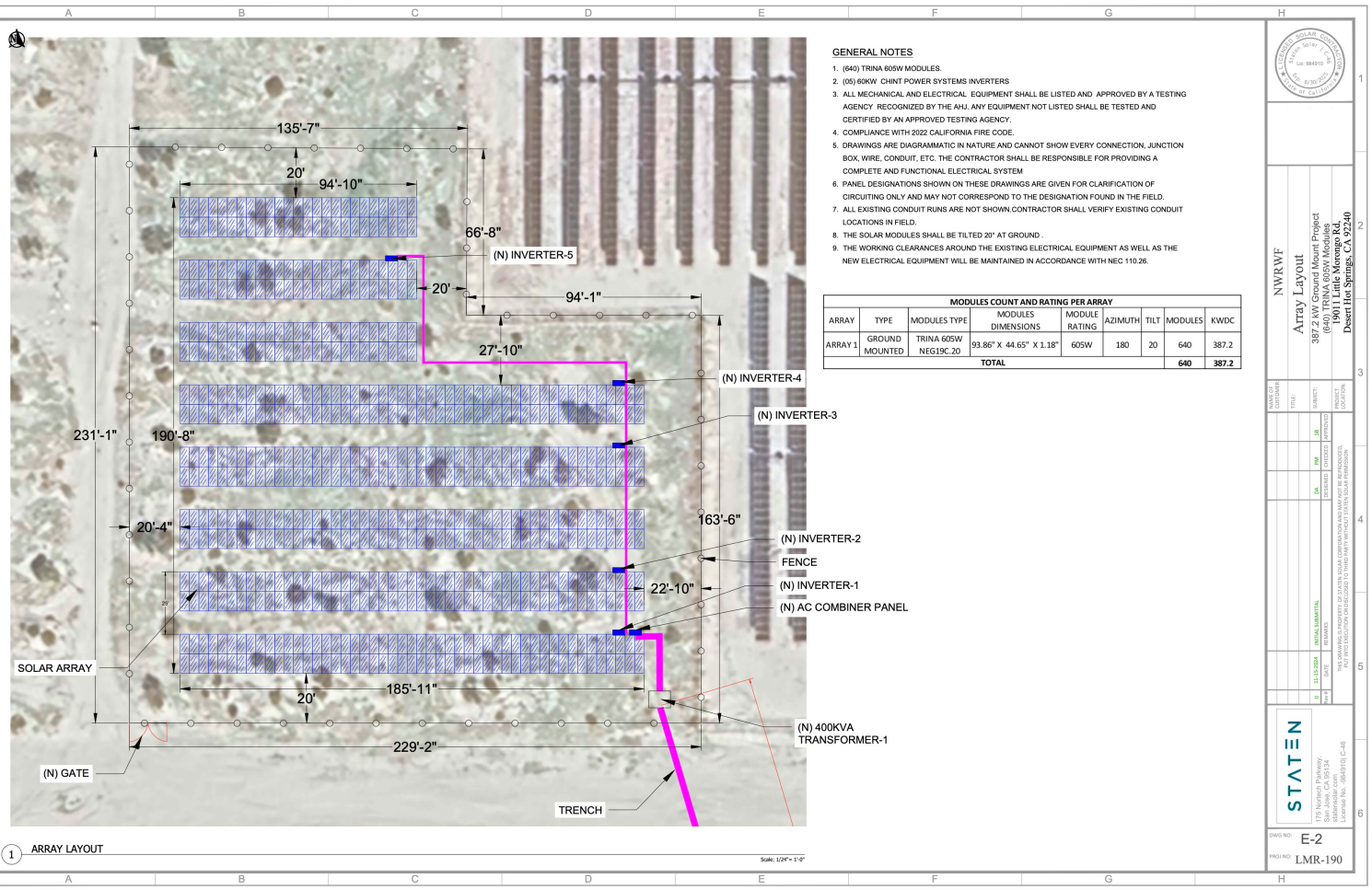

FIGURE 7

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Nancy Wright RWRF Solar System Site Plan

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	☒ Tribal Cultural Resources
☐ Utilities / Service Systems	☐ Wildfire	☒ Mandatory Findings of Significance

DETERMINATION

(To be completed by the Lead Agency)

On the basis of this initial evaluation, the following finding is made:

☐	The proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
☒	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.
☐	The proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
☐	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.
☐	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.

Tom Dodson & Associates — Prepared by

09/09/25 — Date

Lead Agency (signature)

Date

EVALUATION OF ENVIRONMENTAL IMPACTS:

1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).

2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.

3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.

4) "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from "Earlier Analyses," as described in (5) below, may be cross-referenced).

5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:

   a) Earlier Analysis Used. Identify and state where they are available for review.
   b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
   c) Mitigation Measures. For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously

prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.

7) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.

8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.

9) The explanation of each issue should identify:

   a) the significance criteria or threshold, if any, used to evaluate each question; and
   b) the mitigation measure identified, if any, to reduce the impact to less than significance.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
I. **AESTHETICS**: Except as provided in Public Resources Code Section 21099, would the project:				
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?	☐	☐	☒	☐

SUBSTANTIATION

Impact Analysis

a. *Less Than Significant Impact* – MSWD proposes to install ground mounted solar (also termed photovoltaic) systems (solar arrays). Each solar facility will also have a transmission line installed. These proposed solar will be installed directly next to an existing solar facility, located at the northwest intersection of 19th Avenue and Little Morongo Road. As such, the solar arrays will not substantially alter any existing scenic views. The existing scenic views within the project area include the San Bernardino and Little San Bernardino Mountains, which surround the City of Desert Hot Springs to the west and north. The adjoining mountains and the San Jacinto and Santa Rosa Mountains to the southwest and south, also provide dramatic and valuable viewsheds. These mountains are located in the middle- and background views and also provide dramatic and valuable viewsheds. The low nature of the solar facilities means that these scenic views will not be significantly impacted.

While the presence of construction equipment and related construction materials would be visible from public vantage points in the project area, such as from Interstate 10 (I-10) or from area roadways (such as 19th Avenue and Little Morongo Road), it would not adversely affect any scenic views or vistas. Construction of the proposed paved roadway would be temporary, and therefore would not permanently affect views or scenic vistas. Furthermore, construction activities are routine within developed areas, and therefore do not typically constitute a significant aesthetic or scenic vista impact. Thus, construction impacts would be less than significant. Furthermore, the area in which the solar arrays would be installed would be adjacent to existing solar arrays, and therefore would

blend in with the existing site and area environs. As a result, the installation of additional solar arrays adjacent to MSWD's existing solar site would conform to the existing environment, and therefore would not degrade views to nearby scenic vistas. Thus, implementation of the proposed project will have no significant impacts on scenic vistas. No mitigation is required.

b. *No Impact* – The proposed project would install two new solar arrays at the Wright RWRF and RES-BCT sites adjacent to the District's existing solar array at the northwest corner of 19th Avenue and Little Morongo Road. None of the roadways within which the proposed project will be installed are designated as a scenic highway by the State of California. The nearest designated state scenic highway is State Highway 62, located approximately four miles west/north of the project site (**Figure I-1**). Highway 62 is the main corridor gateway to Joshua Tree National Park and the main arterial roadway for the communities of Yucca Valley, Joshua Tree and Twenty-Nine Palms. The project site would not be visible from Highway 62 and no impacts to the State Scenic Highway are anticipated. No rock outcroppings or historic buildings exist within the project footprint and no trees will be impacted by the Solar Development Project. Based on the lack of any intrinsic onsite scenic resources, the proposed project will not cause substantial project-specific damage to any such resources. No impacts are anticipated to occur under this issue. No mitigation is required.

c. *Less Than Significant Impact* – The project site is located in a remote area within City of Desert Hot Springs that is quickly being developed; according to the Governor's Office of Land Use and Climate Innovation (LUCI; formerly Office of Planning and Research [OPR]) Site Check, the project area is a defined urban area.[2] The proposed project would install two new solar arrays at the Wright RWRF and RES-BCT sites adjacent to the District's existing solar array at the northwest corner of 19th Avenue and Little Morongo Road. The proposed Solar Development Project will be installed adjacent to a site already that is developed with solar arrays. The site Zoning Classification is Industrial Light (I-L) (Industrial Cannabis Overlay), and the development of the solar arrays at this site will be designed in accordance with local design guidelines. Therefore, although additional solar panels will add to the existing visual setting, the nature of the existing views will not be changed, and as a result, no significant impact will occur. No mitigation is required.

d. *Less Than Significant Impact* – The proposed project would install two new solar arrays at the Wright RWRF and RES-BCT sites adjacent to the District's existing solar array at the northwest corner of 19th Avenue and Little Morongo Road. Construction of the proposed Solar Development Project is not anticipated to require nighttime lighting, and as a result, construction is not anticipated to result in a significant lighting or glare impact. The solar arrays would be located adjacent to existing solar panels, which have not resulted in glare impacts to nearby sensitive receptors or to aircraft fly-overs. The addition of new solar arrays is not anticipated to result in glare impacts to aircraft fly-overs or nearby sensitive receptors, particularly given the lack of nearby sensitive receptors, and that the project site is located outside of any area airport land use compatibility zones. Further, solar panels typically result in less glare than standards windows, as they are designed to absorb light rather than reflect it.[3] Neither construction nor operation of the proposed development is not anticipated to require nighttime lighting. As a result, there would be no new lighting from the proposed Solar

[2] LUCI, 2025. Site Check. https://sitecheck.opr.ca.gov/ (Accessed 06/26/25)
[3] NREL, 2025. Solar Market Research and Analysis. https://www.nrel.gov/solar/market-research-analysis/blog/posts/research-and-analysis-demonstrate-the-lack-of-impacts-of-glare-from-photovoltaic-modules (Accessed 06/26/25)

Development Project and as a result, light and glare impacts would be expected to be less than significant. No mitigation is required.

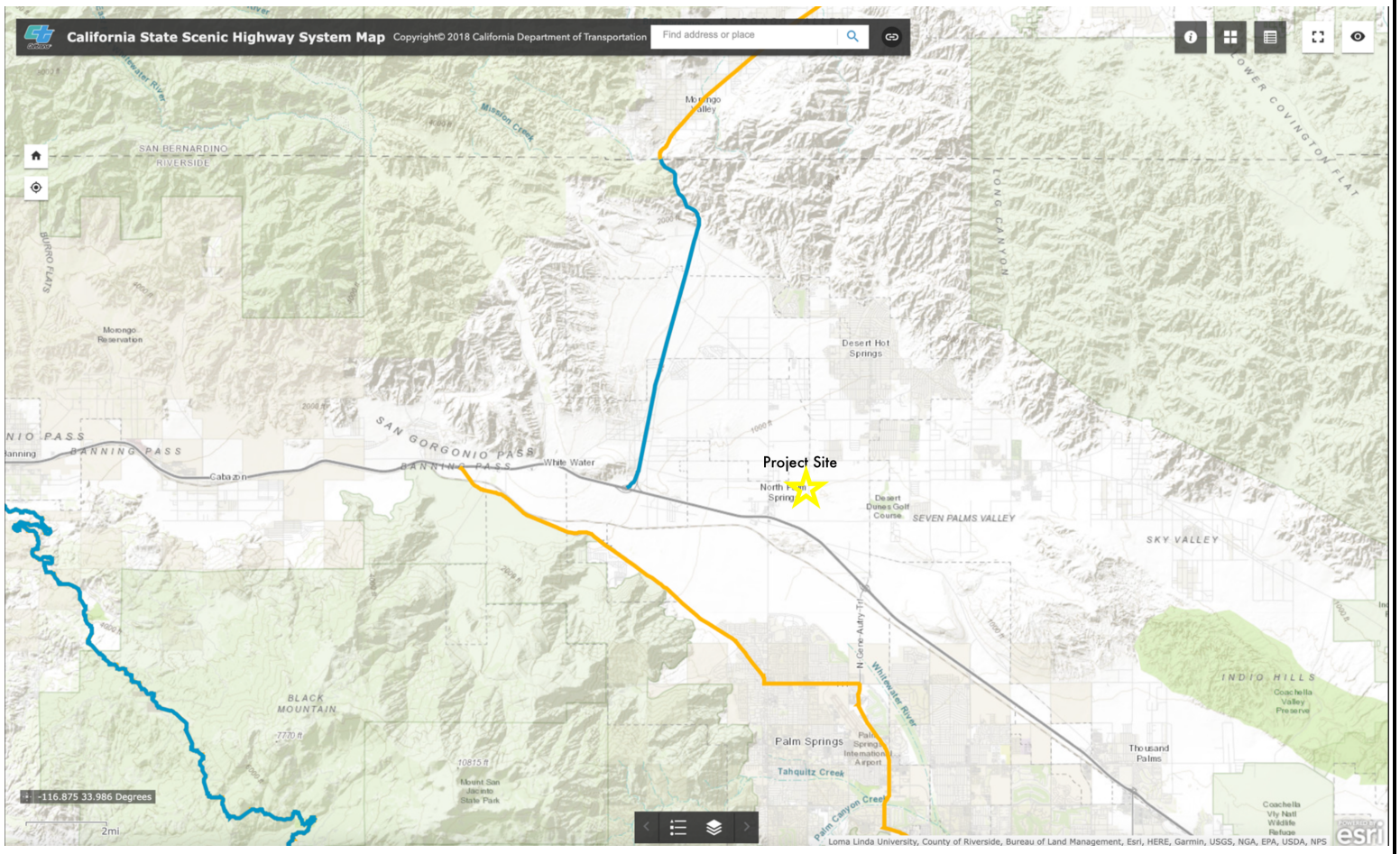

FIGURE I-1

Tom Dodson & Associates
Environmental Consultants

Scenic Highway Map

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
II. 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 the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:				
a) Convert Prime Farmland, Unique Farmland or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
b) Conflict with existing zoning for agricultural use or a Williamson Act contract?	☐	☐	☐	☒
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	☐	☐	☐	☒
d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒

SUBSTANTIATION

Impact Analysis

a. *No Impact* – The proposed project us located in the southern portion of the City of Desert Hot

Springs. The area surrounding the project footprint consists of the in-development District's Wright RWRF, Mission Creek, a solar array, and native desert land. Neither the project footprint nor the adjacent and surrounding properties are designated for agricultural use; no agricultural activities exist in the project area; and there is no potential for impact to any agricultural uses or values as a result of project implementation. According to the maps prepared pursuant to the farmland mapping and monitoring program of the California Resources Agency, no prime farmland, unique farmland, or farmland of statewide importance exists within the vicinity of the proposed project (**Figure II-1**). No adverse impact to any agricultural resources would occur from implementing the proposed project. No mitigation is required.

b. *No Impact* – The project footprint is not now, nor has it been included in a Williamson Act contract or an Agricultural Preserve. Based on these facts, the proposed project will not cause a significant direct impact or conflict with the Williamson Act or an existing agricultural use. Furthermore, the surrounding uses are not agricultural in nature and the City of Desert Hot Springs does not have any current land use designations or zoning classifications for agricultural use. Therefore, the proposed project would have no potential to conflict with existing zoning for agricultural use or a Williamson Act contract.

c. *No Impact* – There are no existing zoning ordinances within the City of Desert Hot Springs that pertain to forest land, timberland, or timberland zoned Timberland Production. Forest land is defined in Public Resources Code Section 12220(g) as "land that can support 10-percent native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits." No timberland or lands zoned Timberland Production, as defined above, occur within project area. The project is not located in an area zoned for forest land or timber production. Therefore, the project will not impact the land's ability to support 10 percent native tree cover of any species; thus, no forest lands will be reclassified as non-forest lands under Public Resources Code Section 12220(g). Therefore, there is no potential for indirect effects to existing zoning for forest land, timberland, or timberland zoned Timberland Production would occur due to implementation of the Solar Development Project.

d. *No Impact* – As described in the preceding evaluation, the proposed project has no potential to cause changes in the existing environment that could result in conversion of farmland to non-agricultural uses or forest land to non-forest use. No such agricultural or forest land uses occur in the vicinity of the project area and the proposed project has no potential to cause conversion of actively farmed land to non-agricultural uses or forested lands to non-forest use. No impacts under this issue are anticipated to occur.

e. *No Impact* – Because the project site and surrounding area do not support either agricultural or forestry uses and, furthermore, because the project site and environs are not designated for such uses, implementation of the proposed project would not cause or result in the conversion of farmland or forest land to alternative use. No adverse impact would occur. No mitigation is required.

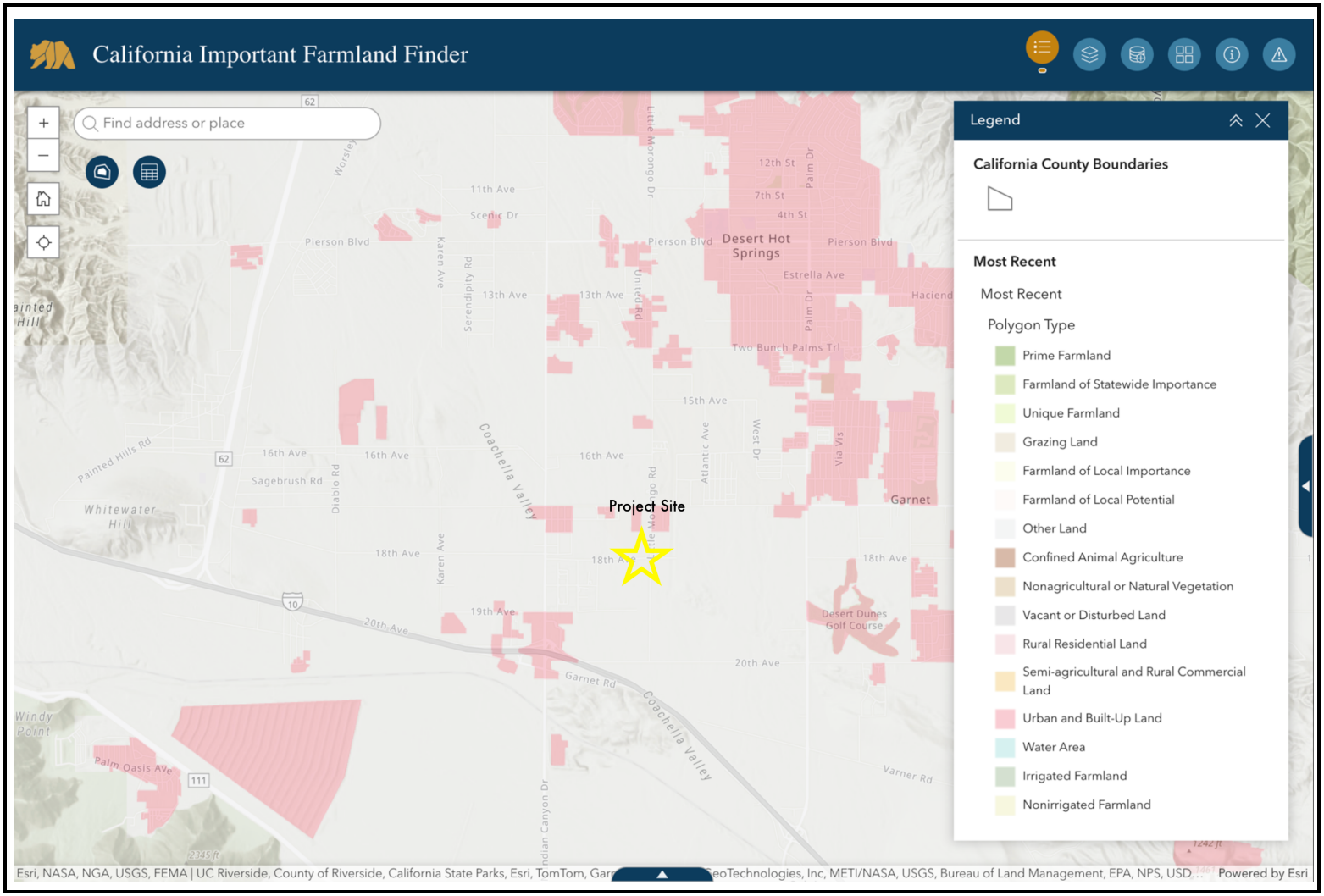

FIGURE II-1

Tom Dodson & Associates
Environmental Consultants

California Important Farmland Finder Map

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
III. AIR QUALITY: Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:				
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?	☐	☐	☒	☐

SUBSTANTIATION: The following information utilized in this section of the Initial Study was obtained from the following technical study: *Mission Springs Water District Well 33 Solar Project Air Quality and Greenhouse Gas Assessment* (AQGGA) prepared by Urban Crossroads, dated September 9, 2025. This AQGGA is provided as **Appendix 2** to this Initial Study.

Background

The project site is located within Salton Sea Air Basin (SSAB) within the jurisdiction of the SCAQMD. The SSAB is aligned in a north-west-southwest orientation stretching from Banning Pass to the Mexican border. The regional climate, as well as the temperature, wind, humidity, precipitation, and amount of sunshine significantly influence the air quality in the Basin.

The climate of the Coachella Valley is a continental, desert-type climate, with hot summers, mild winters, and very little annual rainfall. Precipitation is less than six inches annually and occurs mostly in the winter months from active frontal systems and in the late summer months from thunderstorms. Almost all of the annual rainfall comes from the fringes of mid-latitude storms from late November to early April with summers often being completely dry. Temperatures exceed 100 degrees Fahrenheit (°F), on the average, for four months each year, with daily highs near 110 °F during July and August. Summer nights are cooler with minimum temperatures in the mid-70s. During the winter season, daytime highs are quite mild, but the dry air is conducive to nocturnal radiational cooling, with early morning lows around 40 °F.

The Coachella Valley and adjacent areas are exposed to frequent gusty winds. The flat terrain of the valley and strong temperature differentials, created by intense solar heating, produce moderate winds and deep thermal convection. Wind speeds exceeding 31 miles per hour (mph) occur most frequently in April and

May. On an annual basis, strong winds (greater than 31 mph) are observed 0.6 percent of the time and speeds of less than 6.8 mph account for more than one-half of the observed winds. Prevailing winds are from the northwest through southwest, with secondary flows from the southeast. The strongest and most persistent winds typically occur immediately to the east of Banning Pass, which is noted as a wind power generation resource area. Aside from this locale, the wind conditions in the remainder of the Coachella Valley are geographically distinct. Stronger winds tend to occur closer to the foothills. Less frequently, widespread gusty winds occur over all areas of the Valley.

Portions of the SSAB experience surface inversions almost every day of the year. Inversions in the SSAB are attributed to strong surface heating, but are usually broken, allowing pollutants to disperse more easily. Weak surface inversions are caused by cooling of air in contact with the cold surface of the earth at night. In the valleys and low-lying areas, this condition is intensified by the addition of cold air flowing downslope from the hills and pooling on the valley floor. In addition, inversions in the SSAB caused by the presence of the Pacific high-pressure cell can cause the air mass aloft to sink. As the air descends, compressional heating warms the air to a temperature higher than the air below. This subsidence inversion can act as a nearly impenetrable lid to the vertical mixing of pollutants. These inversions can persist for one or more days, causing air stagnation and the buildup of pollutants. Subsidence inversions are common from November through June and are relatively absent from July through October.

Within the project area, there is a natural sand migration process, called "blowsand," that has direct and indirect effects on air quality. Blowsand produces particulate matter (PM10) in two ways: (1) by direct particle erosion and fragmentation as natural PM10, and (2) by secondary effects, as sand deposits on road surfaces.

Also, where water has already receded around the Salton Sea, the surface areas contain a salty mix of sediments that can change from a hardened salt crust to a fluffy soft layer of dust depending upon the season. Exposed sediments could elevate PM_{10} levels throughout the region. Almost 120,000 acres of Salton Sea lakebed could be exposed as inflows to the Sea decrease in future years. Local communities may be affected by 60,000 potentially dust-blowing acres, which will cause PM_{10} levels to rise.

Criteria Pollutants

Both the U.S. Environmental Protection Agency (EPA) and the California Air Resources Board (CARB) have established ambient air quality standards for common pollutants. These ambient air quality standards are levels of contaminants representing safe levels that avoid specific adverse health effects associated with each pollutant. The ambient air quality standards cover what are called "criteria" pollutants because the health and other effects of each pollutant are described in criteria documents. The six criteria pollutants are ozone (O_3) (precursor emissions include NO_X and reactive organic gases (ROG), CO, particulate matter (PM), nitrogen dioxide (NO_2), sulfur dioxide (SO_2), and lead. Areas that meet ambient air quality standards are classified as attainment areas, while areas that do not meet these standards are classified as nonattainment areas. The Riverside County portion of the SSAB is designated as a nonattainment area for the federal O_3, PM_{10}, and $PM_{2.5}$ standards and is also a nonattainment area for the state standards for O_3 and PM_{10}.

Toxic Air Contaminants (TAC) Trend

In 1984, as a result of public concern for exposure to airborne carcinogens, CARB adopted regulations to reduce the amount of TAC emissions resulting from mobile and area sources, such as cars, trucks,

stationary products, and consumer products. According to the Ambient and Emission Trends of Toxic Air Contaminants in California journal article which was prepared for CARB, results show that between 1990-2012, ambient concentration and emission trends for the seven TACs responsible for most of the known cancer risk associated with airborne exposure in California have declined significantly (between 1990 and 2012). The seven TACs studied include those that are derived from mobile sources: diesel particulate matter (DPM), benzene (C_6H_6), and 1,3-butadiene (C_4H_6); those that are derived from stationary sources: perchloroethylene (C_2Cl_4) and hexavalent chromium (Cr(VI)); and those derived from photochemical reactions of emitted VOCs: formaldehyde (CH_2O) and acetaldehyde (C_2H_4O).[4] The decline in ambient concentration and emission trends of these TACs are a result of various regulations CARB has implemented to address cancer risk.

Applicable Regulatory Requirements

SCAQMD Rules that are currently applicable during construction activity for this project include but are not limited to Rule 403 (Fugitive Dust) and Rule 1113 (Architectural Coatings).

SCAQMD Rule 403

This rule is intended to reduce the amount of particulate matter entrained in the ambient air as a result of anthropogenic (human-made) fugitive dust sources by requiring actions to prevent and reduce fugitive dust emissions. Rule 403 applies to any activity or human-made condition capable of generating fugitive dust and requires best available control measures to be applied to earth moving and grading activities. This rule is intended to reduce PM_{10} emissions from any transportation, handling, construction, or storage activity that has the potential to generate fugitive dust. PM_{10} suppression techniques are summarized below.

- Portions of a construction site to remain inactive longer than a period of three months will be seeded and watered until grass cover is grown or otherwise stabilized.
- All on-site roads will be paved as soon as feasible or watered periodically or chemically stabilized.
- All material transported off-site will be either sufficiently watered or securely covered to prevent excessive amounts of dust.
- The area disturbed by clearing, grading, earthmoving, or excavation operations will be minimized at all times.
- Where vehicles leave a construction site and enter adjacent public streets, the streets will be swept daily or washed down at the end of the workday to remove soil tracked onto the paved surface.

Methodology

The California Air Pollution Control Officers Association (CAPCOA) in conjunction with other California air districts, including SCAQMD, released CalEEMod 2022 in May 2022. CalEEMod periodically releases updates, as such the latest version available at the time of this report has been utilized in this analysis. The purpose of this model is to calculate construction-source and operational-source criteria pollutant (VOCs, NO_X, SO_X, CO, PM_{10}, and $PM_{2.5}$) and GHG emissions from direct and indirect sources; and quantify applicable air quality and GHG reductions achieved from mitigation measures. Accordingly, the latest version of CalEEMod has been used for this project to determine construction and operational air quality and GHG emissions.

[4] It should be noted that ambient DPM concentrations are not measured directly. Rather, a surrogate method using the coefficient of haze (COH) and elemental carbon (EC) is used to estimate DPM concentrations.

Air Quality Regional Emissions Thresholds
The SCAQMD has developed regional significance thresholds for criteria pollutants, as summarized at Table III-1. The SCAQMD's CEQA Air Quality Significance Thresholds (March 2023) indicate that any projects in the SCAB with daily emissions that exceed any of the indicated thresholds should be considered as having an individually and cumulatively significant air quality impact.

Table III-1: Maximum Daily Regional Emissions Thresholds

Pollutant	Construction	Operations
NO_X	100 lbs./day	55 lbs./day
VOC	75 lbs./day	55 lbs./day
PM_{10}	150 lbs./day	150 lbs./day
$PM_{2.5}$	55 lbs./day	55 lbs./day
SO_X	150 lbs./day	150 lbs./day
CO	550 lbs./day	550 lbs./day

lbs./day – Pounds Per Day

Impact Analysis

a. *Less Than Significant Impact* – The project site is located within the SSAB, which is characterized by relatively poor air quality. The SCAQMD has jurisdiction over an approximately 10,743-square-mile area consisting of the four-county Basin and the Los Angeles County and Riverside County portions of what use to be referred to as the Southeast Desert Air Basin. In these areas, the SCAQMD is principally responsible for air pollution control, and works directly with the Southern California Association of Governments (SCAG), county transportation commissions, local governments, as well as state and federal agencies to reduce emissions from stationary, mobile, and indirect sources to meet state and federal ambient air quality standards.

Currently, certain state and federal air quality standards are exceeded in most parts of the SCAB. In response, the SCAQMD has adopted a series of AQMPs to meet the state and federal ambient air quality standards. AQMPs are updated regularly in order to more effectively reduce emissions, accommodate growth, and to minimize any negative fiscal impacts of air pollution control on the economy.

In December 2022, the SCAQMD released the Final 2022 AQMP (2022 AQMP). The 2022 AQMP continues to evaluate current integrated strategies and control measures to meet the CAAQS, as well as explore new and innovative methods to reach its goals. Some of these approaches include utilizing incentive programs, recognizing existing co-benefit programs from other sectors, and developing a strategy with fair-share reductions at the federal, state, and local levels. Similar to the 2016 AQMP, the 2022 AQMP incorporates scientific and technological information and planning assumptions, including the 2020-2045 RTP/SCS, a planning document that supports the integration of land use and transportation to help the region meet the federal CAA requirements. The project's consistency with the AQMP will be determined using the 2022 AQMP as discussed below. SCAG adopted the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (2020-2045 RTP/SCS), a planning document that supports the integration of land use and transportation to help the region meet the federal metropolitan planning organization (MPO) requirements under the Sustainable communities and Climate Protection Act. The proposed project would be

developed in accordance with all applicable rules and regulations contained in those plans. It should be noted that although the 2024-2050 RTP was released after approval of the 2022 AQMP, the 2022 AQMP is reliant in part upon the general plan land use designations.

Criteria for determining consistency with the AQMP are defined in Chapter 12, Section 12.2 and Section 12.3 of the 1993 CEQA Handbook. These indicators are discussed below.

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 violations that under this criterion refer to are the CAAQS and NAAQS. CAAQS and NAAQS violations would occur if regional or localized significance thresholds were exceeded.

CAAQS and NAAQS violations would occur if regional or localized significance thresholds were exceeded. As evaluated, the project's regional and localized construction and operational-source emissions would not exceed applicable regional significance thresholds. As such, a less than significant impact is expected.

On the basis of the preceding discussion, the project is determined to be consistent with the first criterion.

The project will not exceed the assumptions in the AQMP based on the years of project build-out phase.

The 2022 AQMP demonstrates that the applicable ambient air quality standards can be achieved within the timeframes required under federal law. Growth projections from local general plans adopted by cities in the district are provided to the SCAG, which develops regional growth forecasts, which are then used to develop future air quality forecasts for the AQMP. Development consistent with the growth projections in Desert Hot Springs General Plan and further, consistent with the MSWD Urban Water Management Plan, is considered to be consistent with the AQMP.

Peak day emissions generated by construction activities are largely independent of land use assignments, but rather are a function of development scope and maximum area of disturbance. Irrespective of the site's land use designation, development of the site to its maximum potential would likely occur, with disturbance of the entire site occurring during construction activities. As such, when considering that no emissions thresholds will be exceeded, a less than significant impact would result.

On the basis of the preceding discussion, the project is determined to be consistent with the second criterion, and as a result, the project is determined to be consistent with the AQMP and the project would result in a less than significant impact under this issue.

b. *Less Than Significant Impact* – Air pollution emissions associated with the proposed project would occur over both a short and long-term time period. Short-term emissions include fugitive dust from construction activities (i.e., site prep, demolition, grading) and exhaust emissions at the project site.

Long-term emissions generated by future operation of the proposed paved roadway would not differ substantially from that which occurs at present, as the project would reduce fugitive dust generation from automobiles traveling on the existing dirt roadways, and enhance access to future development in the area that may be served by these roadway improvements.

Construction Emissions

Construction Activities

Construction activities associated with the project would result in emissions of VOCs, NO_X, SO_X, CO, PM_{10}, and $PM_{2.5}$. Construction-related emissions are expected from the following activities:

- Site Preparation
- Grading
- Building Construction (Solar Installation)
- Paving
- Trenching

Grading Activities

Dust is typically a major concern during grading activities. Because such emissions are not amenable to collection and discharge through a controlled source, they are called "fugitive emissions." Fugitive dust emission rates vary as a function of many parameters (soil silt, soil moisture, wind speed, area disturbed, number of vehicles, depth of disturbance or excavation, etc.). CalEEMod was utilized to calculate fugitive dust emissions resulting from this phase of activity. Based on data provided by the Project applicant no import or export of soil would be required.

On-Road Trips

Construction generates on-road vehicle emissions from vehicle usage for workers, vendors, and haul trucks commuting to and from the site. For worker trips, it is assumed that up to 15 individuals will be working on the construction site per day, though the number of construction workers will vary between 9 and 15 per day. Additionally, it is assumed that up to 5 vendor trucks will visit the site per day. Worker and vendor trips are estimated based on CalEEMod default parameters.

Construction Duration

For purposes of analysis, construction of the Project is expected to commence in November 2025 and end in March 2026. The construction schedule utilized in the analysis represents a "worst-case" analysis scenario should construction occur any time after the respective dates since emission factors for construction decrease as time passes and the analysis year increases due to emission regulations becoming more stringent. The duration of construction activity and associated equipment represents a reasonable approximation of the expected construction fleet.

Construction Equipment

The equipment modeled is based on information provided by MSWD and CalEEMod model defaults. Consistent with industry standards and typical construction practices, each piece of equipment will operate up to a total of eight (8) hours per day, or more than two-thirds of the period during which construction activities are allowed pursuant to the code.

Construction Emissions Summary

Construction emissions were calculated using California Emissions Estimator Model (CalEEMod), version 2022.1. As shown below on Table II-1, the proposed Project construction emissions would not exceed the applicable SCAQMD regional significance thresholds for any pollutant.. Thus, the project would result in a less than significant impact associated with construction activities. Detailed Construction model outputs are presented in Attachment A to **Appendix 2.**

Table III-2: Maximum Daily Construction Air Quality Emissions

Year	Emissions (lbs/day)					
	VOC	NO_X	CO	SO_2	PM_{10}	$PM_{2.5}$
Summer						
2025	0	0	0	0	0	0
2026	0	0	0	0	0	0
Winter						
2025	3.92	35.83	31.70	0.06	0.58	0.32
2026	2.70	8.24	12.72	0.02	0.06	0.03
Maximum Daily Emissions	3.92	35.83	31.70	0.06	0.58	0.32
SCAQMD Regional Thresholds	75	100	550	150	150	55
Threshold Exceeded?	NO	NO	NO	NO	NO	NO

lbs/day = pounds per day
VOC = Volatile Organic Compounds
NO_X = Nitrogen Oxides
CO = Carbon Monoxide
SO_2 = Sulfur Dioxide
PM_{10} = Particulate Matter 10 microns in diameter or less
$PM_{2.5}$ = Particulate Matter 2.5 microns in diameter or less

Regional Operational Emissions

The proposed project primarily involves construction activity. Once constructed, only minimal additional traffic would be generated by this project than that which occurs at present or is otherwise planned to occur as part of area development because other than solar facility maintenance which would occur on a routine basis (approximately once a month), no other operational trips are anticipated. The proposed project would generate approximately 9,412.878 kilowatt hours (kWh) of electricity per year, and as a result, operational emissions would be anticipated to be nil or negligible, as the proposed alternative source of energy would offset electricity use from energy sources that generate air quality emissions. As such, the project would not violate an air quality standard or contribute to an existing violation. Therefore, project operations would not result in a cumulatively considerable net increase of any criteria pollutant and impacts would be less than significant.

Conclusion

The project, as evaluated herein would not exceed the regional or localized air quality significance thresholds. The CAAQS designates the project site as nonattainment for O_3, PM_{10}, and $PM_{2.5}$ while the NAAQS designates the project site as nonattainment for O_3 and $PM_{2.5}$.

The SCAQMD has published a report on how to address cumulative impacts from air pollution:

White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution. In this report the SCAQMD clearly states (Page D-3):
"…the SCAQMD uses the same significance thresholds for project specific and cumulative impacts for all environmental topics analyzed in an Environmental Assessment or EIR. The only case where the significance thresholds for project specific and cumulative impacts differ is the Hazard Index (HI) significance threshold for TAC emissions. The project specific (project increment) significance threshold is HI > 1.0 while the cumulative (facility-wide) is HI > 3.0. It should be noted that the HI is only one of three TAC emission significance thresholds considered (when applicable) in a CEQA analysis. The other two are the maximum individual cancer risk (MICR) and the cancer burden, both of which use the same significance thresholds (MICR of 10 in 1 million and cancer burden of 0.5) for project specific and cumulative impacts.

Projects that exceed the project-specific significance thresholds are considered by the SCAQMD to be cumulatively considerable. This is the reason project-specific and cumulative significance thresholds are the same. Conversely, projects that do not exceed the project-specific thresholds are generally not considered to be cumulatively significant."

Therefore, this analysis assumes that individual projects that do not generate operational or construction emissions that exceed the SCAQMD's recommended daily thresholds for project-specific impacts would also not cause a cumulatively considerable increase in emissions for those pollutants for which SSAB is in nonattainment, and, therefore, would not be considered to have a significant, adverse air quality impact. Alternatively, individual project-related construction and operational emissions that exceed SCAQMD thresholds for project-specific impacts would be considered cumulatively considerable.

Construction Impacts: The project-specific evaluation of emissions presented in the preceding analysis demonstrates that proposed project construction-source air pollutant emissions would not result in exceedances of regional thresholds. Therefore, proposed project construction-source emissions would be considered less than significant on a project-specific and cumulative basis.

Operational Impacts: The project-specific evaluation of air quality impacts presented in the preceding analysis demonstrates that proposed project operational-source air pollutant emissions would not result in exceedances of regional thresholds. Therefore, the proposed project operational-source emissions would be considered less than significant on a project-specific and cumulative basis.

c. *Less Than Significant Impact* – The potential impact of project-generated air pollutant emissions at sensitive receptors has also been considered.

Localized Construction Emissions

For this project, the appropriate SRA for the LST analysis is the SCAQMD Coachella Valley monitoring station (SRA 30). LSTs apply to CO, NO2, PM10, and PM2.5. The SCAQMD produced look-up tables for projects less than or equal to 5 acres in size. The SCAQMD's screening look-up tables are utilized in determining localized impacts. It should be noted that since the look-up tables identify thresholds at only 1 acre, 2 acres, and 5 acres, linear regression has been utilized to determine localized significance thresholds.

The analysis makes use of methodology included in the SCAQMD *Final Localized Significance Threshold Methodology* (LST Methodology). The SCAQMD has established that impacts to air quality are significant if there is a potential to contribute or cause localized exceedances of the federal and/or state ambient air quality standards (NAAQS/CAAQS). Collectively, these are referred to as Localized Significance Thresholds (LSTs). The SCAQMD established LSTs in response to the SCAQMD Governing Board's Environmental Justice Initiative I-4[5]. LSTs represent the maximum emissions from a project that will not cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standard at the sensitive receptor.

The SCAQMD recommends that the nearest sensitive receptor be considered when determining the project's potential to cause an individual or cumulatively significant impact. The nearest land use where an individual could remain for 24 hours to the project site has been used to determine localized construction and operational air quality impacts for emissions of PM_{10} and $PM_{2.5}$ (since PM_{10} and $PM_{2.5}$ thresholds are based on a 24-hour averaging time.

The nearest receptor used for evaluation of localized impacts of PM_{10} and $PM_{2.5}$ is over 3,500 feet north of the project site. It should be noted that the look-up tables only identify thresholds up to a 500-meter distance. As a conservative measure, the 500-meter distance will be used in lieu of the 1,176-meter distance in order to evaluate localized PM_{10} and $PM_{2.5}$ emission impacts.

Table III-3 identifies the localized impacts at the nearest receptor location in the vicinity of the project. Outputs from the model runs for construction LSTs are provided in Attachment A of **Appendix 2**. For analytical purposes, emissions associated with peak construction activities are considered for purposes of LSTs since these phases represent the maximum localized emissions that would occur. Any other construction phases of development that overlap would result in lesser emissions and consequently lesser impacts than what is disclosed herein. As shown in Table III-3, emissions resulting from the construction will not exceed the numerical thresholds of significance established by the SCAQMD for any criteria pollutant. Thus, a less than significant impact would occur for localized project-related construction-source emissions and no mitigation is required.

Table III-3: Project Localized Construction Impacts

Peak Construction	CO		NO_2	PM_{10}	$PM_{2.5}$
	Averaging Time				
	1-Hour	8-Hours	1-Hour	24-Hours	24-Hours
Peak Day Localized Emissions	1.12E-02	2.80E-03	7.95E-03	0.10	0.05
Background Concentration [A]	3.4	1.1	0.031		
Total Concentration	3.41	1.10	0.04	0.10	0.05
SCAQMD Localized Significance Threshold	20	9	0.18	10.4	10.4
Threshold Exceeded?	NO	NO	NO	NO	NO

[5] The purpose of SCAQMD's Environmental Justice program is to ensure that everyone has the right to equal protection from air pollution and fair access to the decision-making process that works to improve the quality of air within their communities. Further, the SCAQMD defines Environmental Justice as "…equitable environmental policymaking and enforcement to protect the health of all residents, regardless of age, culture, ethnicity, gender, race, socioeconomic status, or geographic location, from the health effects of air pollution."

As shown in Table III-3, emissions resulting from the construction will not exceed the numerical thresholds of significance established by the SCAQMD for any criteria pollutant. Thus, results of the LST analysis indicate that the project will not exceed the SCAQMD localized significance thresholds during construction. Therefore, sensitive receptors would not be exposed to substantial pollutant concentrations during project construction.

Localized Operational Emissions

According to SCAQMD localized significance threshold methodology, LSTs would apply to the operational phase of a proposed project if the project includes stationary sources or attracts mobile sources that may spend extended periods queuing and idling at the site (e.g., warehouse or transfer facilities). As previously discussed, the purpose of the project is to develop an alternative electricity generating facility through the proposed Solar Development Project. The project will not include new stationary or mobile sources. Therefore, the project would not expose sensitive receptors to substantial pollutant concentrations and impacts would be less than significant.

d. *Less Than Significant Impact* – Substantial odor-generating sources include land uses such as agricultural activities, feedlots, wastewater treatment facilities, landfills or various heavy industrial uses. The project does not contain land uses typically associated with emitting objectionable odors. Potential odor sources associated with the proposed project may result from construction equipment exhaust and the application of asphalt and architectural coatings during construction activities and the temporary storage of typical solid waste (refuse) associated with the proposed project's (long-term operational) uses. Standard construction requirements would minimize odor impacts from construction. The construction odor emissions would be temporary, short-term, and intermittent in nature and would cease upon completion of the respective phase of construction and is thus considered less than significant. It is expected that project-generated refuse would be stored in covered containers and removed at regular intervals in compliance with the solid waste regulations. The proposed project would also be required to comply with SCAQMD Rule 402 to prevent occurrences of public nuisances. Therefore, odors associated with the proposed project construction and operations would be less than significant and no mitigation is required.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
IV. BIOLOGICAL RESOURCES: Would the project:				
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, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☐	☒	☐
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☒	☐	☐
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☒	☐
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?	☐	☒	☐	☐

SUBSTANTIATION: The following information is provided based on a Biological Resources Assessment prepared by ELMT Consulting, Inc. dated April 2025 and is titled "*Habitat Assessment & Coachella Valley Multiple Species Habitat Conservation Plan Consistency Analysis.*" The following information is abstracted from the Biological Resources Assessment (BRA) provided as **Appendix 3.**

General Setting

The project area is situated in the City of Desert Hot Springs in the northwestern end of the Coachella Valley, which is bordered on the north and northeast by the Little San Bernardino Mountains, on the east/southeast by the Seven Palms Valley and Edom Hills and on the west by the San Bernardino Mountain foothills. The topography of the project area is generally flat with no significant areas of topographic relief.

Elevation ranges between 757 and 780 feet above mean sea level.

The project sites are historically underlain by Carsitas fine sand (0 to 5 percent slopes) and Carsitas gravelly sand (0 to 9 percent slopes). Additionally, the project site for RES-BCT is underlain by Myoma fine sand (0 to 5 percent slopes)(Refer to **Figure IV-1**). Soils within the project sites are relatively undisturbed.

The project sites are located in an area that has generally undergone a conversion from natural habitats to a mosaic of residential, recreational, commercial, and industrial developments with heavily disturbed/isolated undeveloped parcels, and undisturbed native areas. The sites are bounded to the north by undeveloped, vacant land with commercial and residential developments beyond; to the east by the Willow Hole Conservation Area with residential and vacant land beyond; to the south by commercial land and undeveloped, vacant land with Interstate 10 beyond; and to the west by commercial development with undeveloped, vacant land beyond.

Vegetation

Both project sites support undeveloped land that has been subject to anthropogenic disturbances. Disturbed land is present throughout the site where frequent disturbances (i.e., foot and vehicle traffic, illicit dumping) prevent the establishment of a plant community. Vegetative density in these areas varies from often barren to minimally vegetated, usually with weedy/early successional species. Common plants observed in the disturbed areas of the site include California croton, Saharan mustard and Mediterranean grass.

The project sites support a disturbed creosote bush scrub plant community that varies in density based on proximity to frequent disturbances. This plant community is dominated by creosote (*Larrea tridentata*) and supports an often dense to sparse shrub layer and an herbaceous understory. Common plant species observed in this plant community include burrobush (*Ambrosia dumosa*), cheesebrush (*Ambrosia salsola*), teddy-bear cholla (*Cylindropuntia bigelovii*), California croton (*Croton californicus*), brittlebush (*Encelia farinosa*), desert dandelion (*Malacothrix glabrata*), fourwing saltbrush (*Atriplex canescens*), Saharan mustard (*Brassica tournefortii*), and Mediterranean grass (*Schismus barbatus*).

Wildlife

Fish

No fish or hydrogeomorphic features (e.g., perennial creeks, ponds, lakes, reservoirs) that would provide suitable habitat for fish were observed on the project. Therefore, no fish are expected to occur and are presumed absent.

Amphibians

No amphibians or hydrogeomorphic features (e.g., perennial creeks, ponds, lakes, reservoirs) that would provide suitable habitat for amphibian species were observed on the project. Therefore, no amphibians are expected to occur and are presumed to be absent.

Reptiles

The project site provides limited foraging and cover habitat for local reptile species adapted to regular disturbance and developed conditions. No reptilian species were observed onsite. Reptile species that could be expected to occur on-site include Great Basin fence lizard (*Sceloporus occidentalis longipes*), western fence lizard (*Sceloporus occidentalis*), San Diego gopher snake (Pituophis catenifer annectens),

desert iguana (Dipsosaurus dorsalis), sidewinder (Crotalus cerastes), and coachwhip (*Coluber flagellum piceus*), and western side-blotched lizard (Uta stansburiana elegans).

Birds

The project site provides suitable foraging and nesting habitat for a variety of bird species adapted to urban environments. Bird species detected onsite during the investigation include American crow (*Corvus brachyrhynchos*), common raven (*Corvus corax*), California towhee (*Melozone crissalis*), and white-crowned sparrow (*Zonotrichia leucophrys*). Other common species that can be expected to occur on-site include house finch (*Haemorhous mexicanus*), Anna's hummingbird (*Calypte anna*), red-tailed hawk (*Buteo jamaicensis*), song sparrow (Melospiza melodia), black phoebe (Sayornis nigricans), Say's phoebe (*Sayornis saya*), Nuttall's woodpecker (Picoides nuttallii), house sparrow (Passer domesticus), and northern mocking bird (Mimus polyglottos).

Mammals

The project site provides suitable foraging and denning habitat for mammalian species adapted to routine human disturbance and desert environments. However, most mammal species are nocturnal and are difficult to observe during a diurnal field visit. The only mammalian species detected and/or sign observed during the field investigation was desert cottontail (*Sylvilagus audubonii*). Another common mammalian species that has the potential to occur on the project site is California ground squirrel (*Otospemophilus beecheyi*). No bat species are expected to roost on-site due to a lack of suitable roosting habitat (i.e., trees, crevices, abandoned structures) within and surrounding the project site.

Nesting Birds

No active nests or birds displaying nesting behavior were observed during the field survey, which was conducted during the breeding season. Although heavily disturbed, the project site and surrounding area have the potential to provide minimal foraging and nesting habitat for year-round and seasonal avian residents, as well as migrating songbirds that could occur in the area that area adapted to disturbed areas and urban environments. Additionally, the site has potential to support ground-nesting birds such as killdeer (Charadrius vociferus). Nesting birds are protected pursuant to the Migratory Bird Treaty Act (MBTA) and California Fish and Game Code (Sections 3503, 3503.5, 3511, and 3513 prohibit the take, possession, or destruction of birds, their nests or eggs). If construction occurs between February 1st and August 31st, a pre-construction clearance survey for nesting birds should be conducted prior to the start of any vegetation removal or ground disturbing activities to ensure that no nesting birds will be disturbed during construction.

Special-Status Plants

No special-status plant species were observed on-site during the field investigation. It was determined that the creosote bush scrub habitat in both project sites has a low potential to support Coachella Valley milkvetch (*Astagalus lentiginosus coachellae*). Based on habitat requirements for specific special-status plant species and the availability and quality of habitats on-site, it was determined the project site does not have potential to support any other special-status plant species known to occur in the area and all are presumed absent. Due to regional significance, the potential occurrence of Coachella Valley milkvetch is discussed in further detail below.

Coachella Valley Milk-Vetch

Coachella Valley milk-vetch can be either an annual or perennial herb that blooms between February and

May. It is federally listed as endangered and is designated by the California Native Plant Society (CNPS) with the Rare Plant Rank 1B.2, indicating that is rare, threatened, or endangered in California and elsewhere, and is considered fairly threatened in California, with 20-80% of its known occurrences threatened. It is covered under the Coachella Valley Multi-Species Habitat Conservation Plan (CVMSHCP). It is endemic to California and is only known from Riverside County. It occurs in sandy soils within desert dunes and Sonoran Desert scrub, where it typically grows at elevations between 130 and 2,150 feet. Coachella Valley milk-vetch is known to occur in many locations throughout the Coachella Valley. Coachella Valley milk-vetch was not observed during the field investigation. The creosote bush scrub supported by the project sites has the potential to provide marginal suitable habitat for this species; and native soils remain. Therefore, Coachella Valley milk-vetch was determined to have a low potential to occur on-site. Since Coachella Valley milk-vetch is a covered species under the CVMSHCP, no further surveys or additional mitigation measures will be required for impacts to this species, if present.

Special-Status Plant Communities

According to the California Natural Diversity Database (CNDDB), two (2) special-status plant community has been reported in the Desert Hot Springs and Seven Palms Valley quadrangles: desert fan palm oasis woodland and mesquite bosque. Based on the results of the field investigation, no special-status plant communities were observed on-site.

Special-Status Wildlife

No special-status species were observed on-site. Based on habitat requirements for specific species and the availability and quality of on-site and adjacent habitats, it was determined that the proposed project site has a high potential to support Coopers hawk (*Accipiter cooperii*), sharp-shinned hawk (*Accipiter striatus*), Costa's hummingbird (Calypte costae), California horned lark (Eremophila alpestris actia), San Diego black-tailed jackrabbit (*Lepus californicus bennettii*), and loggerhead shrike (*Lanius ludovicianus*); and a low potential to support Coachella Valley fringe-toed lizard (*Uma inornata),* and flat-tailed horned lizard (*Phrynosoma mcallii*). It was further determined that the project site does not provide suitable habitat for any of the other special-status wildlife species known to occur in the area since the majority of the project site has been heavily disturbed from on-site disturbances and is surrounded by existing development.

Of the aforementioned species, Coachella Valley fringe-toed lizard is both federally listed as Threatened and state listed as Endangered. None of the other species are federally or state listed as Endangered or Threatened. However, the Loggerhead Shrike is designated by the CDFW as a Species of Special Concern (SSC). In addition, Coachella Valley fringe-toed lizard and flat-tailed horned lizard are covered species under the CVMSHCP.

The only aforementioned special-status avian species expected to nest on-site is California horned lark. None of the remaining aforementioned special-status avian species are expected to nest on-site due to the lack of suitable nesting habitat/opportunities. Further, Cooper's hawk, sharp-shinned hawk, and loggerhead shrike are only expected to occur on-site incidentally while foraging in adjacent areas. As a result, in order to ensure impacts to special-status avian species do not occur from implementation of the proposed project, a pre-construction nesting bird clearance survey shall be conducted prior to ground disturbance.

Cooper's Hawk
Cooper's hawk does not have any formal protection. In desert habitats, it adapts to the sparser vegetation and open spaces and is a year-round resident in southern California. They tend to nest and hunt near desert riparian areas or places with scattered trees and shrubs, which provide essential cover and hunting opportunities. Cooper's hawk was determined to have a high potential to occur on the project site. Prior to the start of construction, a pre-construction nesting bird clearance survey shall be conducted to ensure no impacts to Cooper's hawk to occur.

Sharp-shinned hawk
Sharp-shinned hawk does not have any formal protection. It is a winter resident in southern California, and in desert habitat it is often found near desert riparian zones or areas with some tree coverage, such as along watercourses or in oases. These environments provide essential hunting and nesting opportunities. Sharp- shinned hawk was determined to have a high potential to occur on the project site. Prior to the start of construction, a pre-construction nesting bird clearance survey shall be conducted to ensure no impacts to Sharp-shinned hawk occur.

Costa's Hummingbird
Costa's hummingbird does not have any formal protection. It is a year-round resident in southern California and is found in desert and semi-desert, arid brushy foothills and chaparral. This species is breeds in the Sonoran and Mojave Deserts, and departs desert heat moving into chaparral, scrub, and woodland habitats. Departs desert heat moving into chaparral, scrub, and woodland habitats. Costa's hummingbird was determined to have a high potential to occur on the project site. Prior to the start of construction, a pre- construction nesting bird clearance survey shall be conducted to ensure no impacts to Costa's hummingbird occur.

California Horned Lark
California horned lark does not have any formal protection. It is a year-round resident in southern California and is found in landscapes with minimal vegetation, such as deserts, prairies, and tundra. In these areas, they favor bare, dry ground or spaces with short, sparse vegetation to forage and nest. California horned lark was determined to have a high potential to occur on the project site. Prior to the start of construction, a pre-construction nesting bird clearance survey shall be conducted to ensure no impacts to California horned lark occur.

Loggerhead Shrike
Loggerhead shrike is designated by the California Department of Fish and Wildlife (CDFW) as a Species of Special Concern. It is a year-round resident of southern California. This species is typically found in open country with short vegetation, including pastures, old orchards, cemeteries, golf courses, agricultural fields, riparian areas, and open woodlands. It utilizes somewhat prominent perching positions for hunting and eating. This species primarily nests in thorny shrubs and trees, but will nest in brush piles or other debris if no shrubs or trees are present. The general nesting season extends from the end of January through the end of July. Loggerhead shrike was determined to have a high potential to occur on the project site. Prior to the start of construction, a pre-construction nesting bird clearance survey shall be conducted to ensure no impacts to loggerhead shrike occur.

Coachella Valley Fringe-toed Lizard
Coachella Valley fringe-toed lizard is designated by the United States Fish and Wildlife Service (USFWS)

as Threatened under the Endangered Species Act (ESA) and by the CDFW as endangered under the California Endangered Species Act (CESA). It is covered under the MSHCP. This species is only found in the Coachella Valley, and occurs on areas containing fine, windblown sands. They are rarely, if ever, found outside of this habitat and do not occur on stabilized sands. Vegetative cover is sparse to moderate and is usually dominated by creosote bush, indigo bush, honey mesquite, and four-winged saltbush (*Atriplex canescens*). This species is typically active from spring through fall, especially between April and October. Up to three clutches of eggs are laid between May and September, with juveniles emerging between August and October. No Coachella Valley fringe-toed lizards were observed during the field investigation. The creosote bush scrub community within the project sites support fine wind-blown sand required by Coachella Valley fringe-toed lizard. Therefore, this species was determined to have high potential to occur on the northwest corner of the site. Since Coachella Valley fringe-toed lizard is a covered species under the CVMSHP, no further surveys or additional mitigation measures will be required for impacts to this species, if present.

Burrowing Owl

The burrowing owl (BUOW) is currently listed as a Candidate endangered species under the CESA. It is a grassland specialist distributed throughout western North America where it occupies open areas with short vegetation and bare ground within shrub, desert, and grassland environments. Burrowing owls use a wide variety of arid and semi-arid environments with well-drained, level to gently-sloping areas characterized by sparse vegetation and bare ground (Haug and Didiuk 1993; Dechant et al. 1999). Burrowing owls are dependent upon the presence of burrowing mammals (such as ground squirrels) whose burrows are used for roosting and nesting (Haug and Didiuk 1993). The presence or absence of colonial mammal burrows is often a major factor that limits the presence or absence of burrowing owls. Where mammal burrows are scarce, burrowing owls have been found occupying man-made cavities, such as buried and non-functioning drain pipes, stand-pipes, and dry culverts. Burrowing mammals may burrow beneath rocks and debris or large, heavy objects such as abandoned cars, concrete blocks, or concrete pads. They also require open vegetation allowing line-of-sight observation of the surrounding habitat to forage as well as watch for predators. Despite a systematic search of the project site, no burrowing owls or sign (i.e., pellets, feathers, castings, or whitewash) were observed during the field investigation. Based on the results of the field investigation, it was determined that the project site has a low potential to support burrowing owl. Even though no suitable burrows or sign, was observed onsite, burrowing owls have been documented approximately 0.5 mile west of the project site. As a result, a focused survey is recommended to ensure burrowing owl remain absent from the project site.

Special-Status Habitats

Under the federal Endangered Species Act, "Critical Habitat" is designated at the time of listing of a species or within one year of listing. Critical Habitat refers to specific areas within the geographical range of a species at the time it is listed that include the physical or biological features that are essential to the survival and eventual recovery of that species. The project sites are not located within any federally designated Critical Habitat. The nearest federally designated Critical Habitat occurs 583 feet to the northeast of the project sites for Coachella Valley milk-vetch (Astragalus lentiginosus var. coachellae). As a result, no impacts to Critical Habitat will occur from project implementation.

Jurisdictional Waters

The USFWS National Wetlands Inventory (NWI) and the United States Geological Survey (USGS) National Hydrography Dataset were reviewed to determine if any blueline streams or riverine resources have been

documented within or immediate surrounding the project sites. Based on this review, one blueline streams is mapped as occurring within the project sites. However, upon review of historic aerial footage and during the field investigation, it was determined that the mapped blue-line stream no longer exists due to extensive disturbances upstream. Further, no features were observed on the project sites that would qualify as jurisdictional under the United States Army Corps of Engineers (Corps), Regional Water Quality Control Board (RWQCB), or CDFW. No jurisdictional drainage and/or wetland features were observed within the project site during the field survey. Therefore, development of the proposed project will not result in impacts to Corps, RWQCB, or CDFW jurisdiction and regulatory approvals will not be required.

Impact Analysis

a. *Less Than Significant With Mitigation Incorporated* – Implementation of the proposed project is not anticipated to have a potential for an adverse effect, either directly or through habitat modifications, on species identified as a candidate, sensitive, or special species in local or regional plans, policies, or regulations, or by the CDFW or USFWS. As stated above, no special-status animal species were observed on-site during the field investigation. Based on habitat requirements for the identified special-status wildlife species, known distributions, and the and routine disturbance, it was determined that the proposed project site has a high potential to support Coopers hawk (*Accipiter cooperii*), sharp-shinned hawk (*Accipiter striatus*), Costa's hummingbird (*Calypte costae*), California horned lark (*Eremophila alpestris actia*), San Diego black-tailed jackrabbit (*Lepus californicus bennettii*), and loggerhead shrike (*Lanius ludovicianus*); and a low potential to support Coachella Valley fringe-toed lizard (*Uma inornata*), and flat-tailed horned lizard (*Phrynosoma mcallii*). a systematic search of the project site, no burrowing owls (BUOW) or signs thereof (i.e., pellets, feathers, castings, or whitewash) were observed during the field investigation. Based on the results of the field investigation, it was determined that the project site has a low potential to support burrowing owl. Even though no suitable burrows or sign thereof were observed onsite, burrowing owls have been documented approximately 0.5 mile west of the project site. Therefore, a focused burrowing owl survey is recommended to ensue burrowing owl remain absent from the project site.

The BUOW is a state candidate for listing as an endangered species under CESA. As such, BUOW currently receive the same legal protection afforded to a state listed threatened or endangered species (FGC sections 2074.2 and 2085). If BUOW are determined to be present within the project area prior to project implementation, then any potential project related impacts to BUOW would need to be avoided and coordination with the CDFW may be required. **MMs BIO-1 through BIO-3**, would ensure protection of this species in light of project implementation.

BIO-1 ***Prior to commencement of construction, a protocol burrowing owl survey will be conducted using the 2012 survey protocol methodology identified in the "Staff Report on Burrowing Owl Mitigation, State of California, Natural Resources Agency, Department of Fish and Game, March 7, 2012," or the most recent CDFW survey protocol available. The burrowing owl survey shall be conducted with a minimum of four site visits conducted on four separate days.***

BIO-2 ***A preconstruction presence/absence survey shall be conducted no more 30 days in advance of construction. This survey can overlap with the final protocol burrowing owl survey conducted pursuant to MM BIO-1.***

BIO-3 ***If burrowing owl(s) are detected during the focused surveys within the area of potential effect delineated by the construction contractor in coordination with the biologist, the MSWD shall immediately contact CDFW for coordination of next steps prior to commencing project construction or ground disturbing activities. If a BUOW is found on-site at the time of construction, all activities likely to affect the animal(s) must cease immediately and CDFW shall to be contacted to determine appropriate management actions. All actions thereafter shall be at the discretion and approval of CDFW in compliance with CESA.***

Additionally, loggerhead shrike was determined to have a high potential to occur on the project site. Loggerhead shrike is designated by the CDFW as a Species of Special Concern. Prior to the start of construction, a pre-construction nesting bird clearance survey shall be conducted to ensure no impacts to loggerhead shrike occur.

BIO-4 ***Regardless of the time of year, a preconstruction survey shall be performed to verify absence of nesting birds. A qualified biologist shall conduct the pre-activity survey within the project areas (including access routes) and a 500-foot buffer surrounding the project areas, no more than three (3) days prior to the initiation of project activities, including, but not limited to clearing, grubbing, and/or rough grading to prevent impacts to birds and their nests. Pre-construction surveys shall focus on both direct and indirect evidence of nesting, including nest locations and nesting behavior. The qualified biologist shall make every effort to avoid potential nest predation as a result of survey and monitoring efforts. If nesting bird activity is present within the work area or the project's zone of influence (generally 100-300 feet), a no disturbance buffer zone shall be established by the qualified biologist to be marked on the ground around each nest. The buffer shall be a minimum of 500 feet for raptors and 300 feet for songbirds, unless a smaller buffer is specifically determined by a qualified biologist familiar with the nesting phenology of the nesting species. The buffer areas shall be avoided until the nests are no longer occupied and the juvenile birds can survive independently from the nests. Active nest(s) and an established buffer distance(s) shall be monitored daily by the qualified biologist until the qualified biologist has determined the young have fledged or the project has been completed. The qualified biologist has the authority to stop work if nesting pairs exhibit signs of disturbance. If there is no nesting activity, then no further action is needed for this measure. If an active nest is encountered during the project construction, construction shall stop immediately until a qualified biologist can determine (1) the status of the nest, and (2) when work can proceed without risking violation to state or federal laws.***

There is no suitable habitat for the any other special status species within the project site. Given that the proposed project would not impact any CVMSHCP Conservation Areas, under which the Coachella Valley milk-vetch and Coachella Valley fringe-toed lizard are all CVMSHCP Covered Species and CVMSHCP provides "take" authorization for Covered Species during otherwise lawful activities, by providing for the conservation of the Covered Species (refer to the discussion under issue "e" below). The CVMSHCP does not identify modeled habitat for any species as occurring within the project site (refer to Appendix E of **Appendix 3** to this Initial Study, CVMSHCP Covered

Species). Based on the results of the field investigation, the project site contains primarily disturbed land that has been subjected to a variety of anthropogenic disturbances. These disturbances have reduced, if not eliminated, the ability of the project site to provide suitable habitat for CVMSHCP Covered species throughout the majority of the project site. However, the creosote bush scrub plant community within the project sites provide suitable habitat for CVMSHCP Covered species. Due to the project footprint occurring within disturbed habitats, potential impacts to CVMSHCP Covered Species are expected to occur from project implementation. No other sensitive species have been identified as having a potential to exist within or be impacted by the proposed project. Therefore, with the implementation of **MMs BIO-1 through BIO-4,** as well as **MM BIO-5,** which shall ensure compliance with the provisions of the CVMSHCP**,** the proposed project would have a less than significant potential to result in 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. *Less Than Significant Impact* – Implementation of the proposed project has minimal potential to have an adverse effect on any riparian habitat or sensitive natural community identified in local or regional plans, policies, regulations, or by the CDFW or USFWS. As stated in the BRA provided as **Appendix 3** prepared by ELMT, the project area does not contain any sensitive habitats, including any USFWS designated Critical Habitat for any federally listed species, and the project will not result in any loss or adverse modification of Critical Habitat. Furthermore, no intermittent or ephemeral dry washes that would meet the definitions of State and federal jurisdictional waters as defined by Section 1600 of the State of California FGC or "Waters of the United States" (WOTUS) as defined by Section 404 of the Clean Water Act (CWA) occur on the project site. Therefore, no regulatory permits from these agencies will be required for this project. Based on the field survey conducted by ELMT and the information contained in **Appendix 3,** no significant impacts to riparian habitat or other sensitive communities are anticipated to occur as a result of implementation of the proposed project.

c. *No Impact* – According to the data gathered by ELMT in **Appendix 3**, no federally protected wetlands occur within the project footprint. Therefore, no CWA Sections 404/401 permitting through the Corps or RWQCB would be required. Furthermore, the project will not impact any aquatic resources or habitats subject to regulation by the CDFW under Section 1602 of the California Fish and Game Code (FGC) or the RWQCB under the Porter-Cologne Water Quality Control Act, respectively. Thus, implementation of the proposed project will have no potential to impact state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means. No mitigation is required.

d. *Less Than Significant With Mitigation Incorporated* – Based on the field survey of the project site, the project will not substantially interfere with the movement of any native resident or migratory species or with established native or migratory wildlife corridors, or impede the use of native nursery sites. Habitat linkages provide connections between larger habitat areas that are separated by development. Wildlife corridors are similar to linkages but provide specific opportunities for animals to disperse or migrate between areas. A corridor can be defined as a linear landscape feature of sufficient width to allow animal movement between two comparatively undisturbed habitat fragments. Adequate cover is essential for a corridor to function as a wildlife movement area. It is

possible for a habitat corridor to be adequate for one species yet still inadequate for others. Wildlife corridors are features that allow for the dispersal, seasonal migration, breeding, and foraging of a variety of wildlife species. Additionally, open space can provide a buffer against both anthropogenic disturbance and natural fluctuations in resources.

According to the CVMSHCP, the project site does not occur within any identified wildlife migratory corridors or linkages. However, the project site lies approximately 65 feet west of the Willow Hole Conservation Area. Since project activities are not expected to extend beyond site boundaries, implementation of the proposed project is not expected to have any direct or indirect impacts to the Willow Hole Conservation Area. As a result, implementation of the proposed project will not disrupt or have any adverse effects on any migratory corridors or linkages in the surrounding area.

However, the State does protect all migratory and nesting native birds. Further, the project site and surrounding area consists of habitat that is suitable to support nesting birds. Thus, the project area may include areas that function as nesting locations for native birds. To avoid impacting nesting birds as required by the Migratory Bird Treaty Act (MBTA) and California FGC, the **MM BIO-4** shall be implemented to ensure impacts on nesting birds would be less than significant. Thus, with implementation of the above measure, any effects on wildlife movement or the use of wildlife nursery sites can be reduced to a less than significant impact.

e. *Less Than Significant Impact* – Development of the proposed project would have a less than significant potential to conflict with any local policies or ordinances protecting biological resources. Impacts to biological resources have been addressed above under issues IV(a-d). Due to the nature of the proposed project, which would install ground mounted solar adjacent to an existing solar site, no trees or other locally protected biological resources exist within the project footprint. Therefore, the potential for the project to conflict with local policies or ordinances pertaining to biological resources would be considered less than significant.

f. *Less Than Significant With Mitigation Incorporated* – Please refer to the discussion under Conclusion and issue IV(a), above. The County of Riverside developed the CVMSHCP to enhance and maintain biological diversity and ecosystem processes while allowing future economic growth. The CVMSHCP sets Conservation Goals and Objectives to ensure the conservation of the Covered Species and conserved natural communities in the Multi-Species Habitat Conservation Plan (MSHCP) Reserve System. In addition to setting Conservation Goals and Objectives for the Covered Species and conserved natural communities, the MSHCP has designated Core Habitat, Other Conserved Habitat, Essential Ecological Processes, and Biological Corridors and Linkages. The CVMSHCP area is divided into Conservation Areas based on a combination of ecological and jurisdictional factors. The CVMSHCP is intended to satisfy the legal requirements to authorize the "take" of species covered under the Plan during otherwise lawful activities, by providing for the conservation of the Covered Species. The BRA provided as **Appendix 3** concluded that the project area is outside of any CVMSHCP Conservation Areas, but that the project will need to conform with the Guidelines for projects that are adjacent CVMSHCP Conservation Areas. Thus, the proposed project shall be required to adhere to the CVMSHCP guidelines through the implementation of **MM BIO-5.**

BIO-5 The project shall be required to comply with the provisions of the Coachella Valley Multi-Species Habitat Conservation Plan requirements for projects adjacent to

Conservation Areas.

1) *Drainage – Proposed Development adjacent to or within a Conservation Area shall incorporate plans to ensure that the quantity and quality of runoff discharged to the adjacent Conservation Area is not altered in an adverse way when compared with existing conditions. Stormwater systems shall be designed to prevent the release of toxins, chemicals, petroleum products, exotic plant materials or other elements that might degrade or harm biological resources or ecosystem processes within the adjacent Conservation Area.*
2) *Toxics – Land uses proposed adjacent to or within a Conservation Area that use chemicals or generate byproducts such as manure that are potentially toxic or may adversely affect wildlife and plant species, Habitat, or water quality shall incorporate measures to ensure that application of such chemicals does not result in any discharge to the adjacent Conservation Area.*
3) *Lighting – For proposed Development adjacent to or within a Conservation Area, lighting shall be shielded and directed toward the developed area. Landscape shielding or other appropriate methods shall be incorporated in project designs to minimize the effects of lighting adjacent to or within the adjacent Conservation Area in accordance with the guidelines to be included in the Implementation Manual.*
4) *Noise – Proposed Development adjacent to or within a Conservation Area that generates noise in excess of 75 dBA Leq hourly shall incorporate setbacks, berms, or walls, as appropriate, to minimize the effects of noise on the adjacent Conservation Area in accordance with the guidelines to be included in the Implementation Manual.*
5) *Invasives – Invasive, non-native plant species shall not be incorporated in the landscape for land uses adjacent to or within a Conservation Area. Landscape treatments within or adjacent to a Conservation Area shall incorporate native plant materials to the maximum extent Feasible; recommended native species are listed in Table 4-112 [of the CVMSHCP]. The plants listed in Table 4-113 [of the CVMSHCP] shall not be used within or adjacent to a Conservation Area. This list may be amended from time to time through a Minor Amendment with Wildlife Agency Concurrence.*
6) *Barriers – Land uses adjacent to or within a Conservation Area shall incorporate barriers in individual project designs to minimize unauthorized public access, domestic animal predation, illegal trespass, or dumping in a Conservation Area. Such barriers may include native landscaping, rocks/boulders, fencing, walls and/or signage.*
7) *Grading/Land Development – Manufactured slopes associated with site Development shall not extend into adjacent land in a Conservation Area.*

Further, as discussed under issue IV(a), above, based on the results of the field investigation, the project site contains primarily disturbed land that has been subjected to a variety of anthropogenic disturbances. These disturbances have reduced, if not eliminated, the ability of the project site to provide suitable habitat for CVMSHCP Covered species throughout the majority of the project site. However, the creosote bush scrub plant community within the project sites provide suitable habitat for CVMSHCP Covered species. Due to the project footprint occurring within disturbed habitats,

potential impacts to CVMSHCP Covered Species are expected to occur from project implementation. Therefore, with the implementation of the above mitigation, the project as described would be consistent with the Conservation Goals and Objectives set forth in the CVMSHCP. Impacts are less than significant with mitigation incorporated.

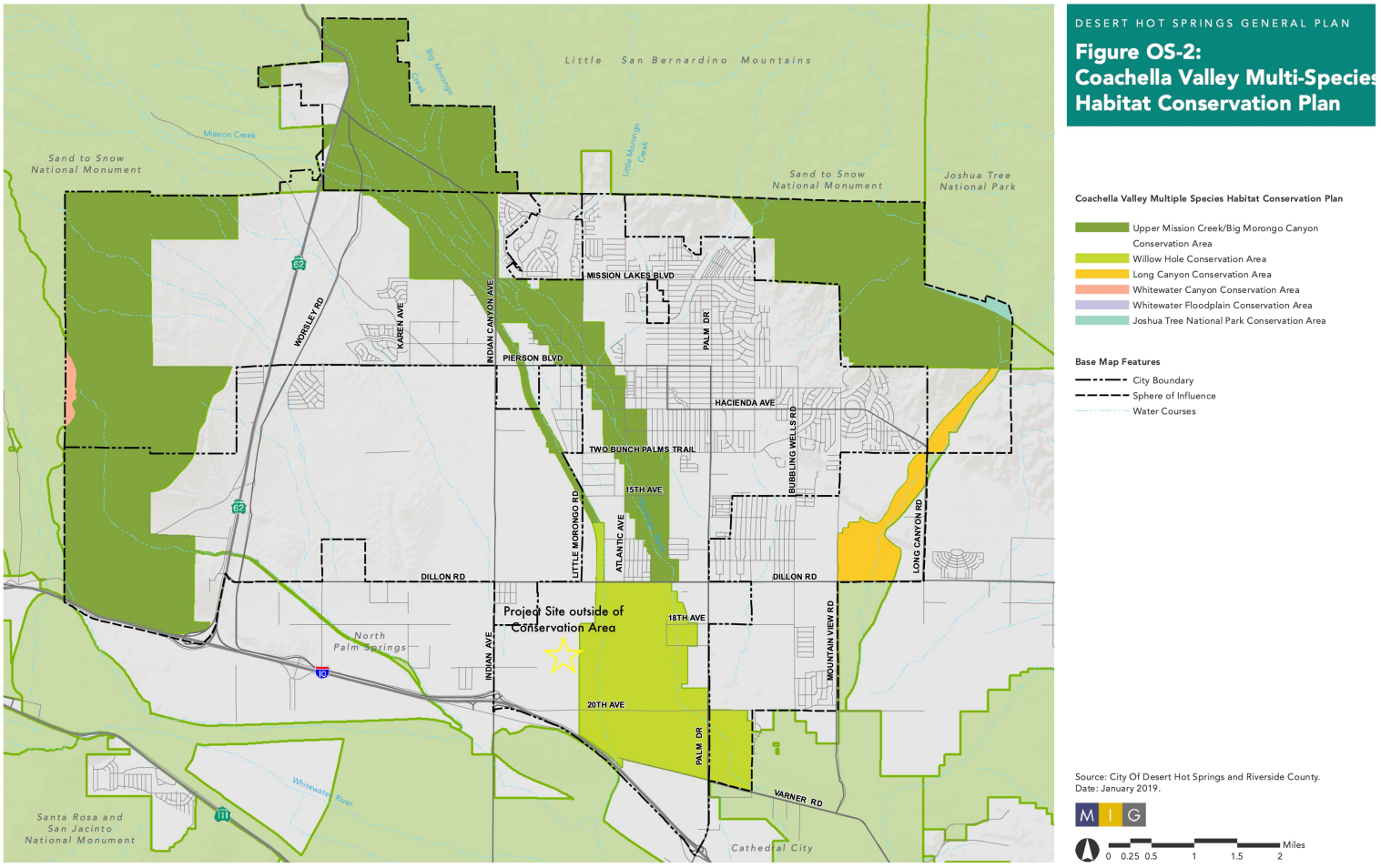

FIGURE IV-1

Tom Dodson & Associates
Environmental Consultants

CVMSHCP Map

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
V. CULTURAL RESOURCES: Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	☐	☒	☐	☐
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☐	☒	☐	☐
c) Disturb any human remains, including those interred outside of formal cemeteries?	☐	☐	☒	☐

SUBSTANTIATION: A cultural resources report has been prepared to evaluate the potential for cultural resources to occur within the project area of potential effect entitled "*Cultural Resources Assessment for the Mission Springs Water District RES-BCT and Regional Water Reclamation Facility Solar Project, Desert Hot Springs, Riverside County California*" prepared by Mojave Archaeological Consulting dated September 5, 2025 (**Appendix 4**). The following information is abstracted from this report. It provides an overview and findings regarding the cultural resources found within the project area.

Background

The project is, in part, part of the continued development of the Nancy Wright RWRF, as a portion of the proposed solar development project would support the electricity needs of the Wright RWRF. The project would also support MSWD's overall growing energy demand within its service area through the new RES-BCT solar development. MSWD will complete street improvements adjacent to the Nancy Wright RWFR. In 2019, the Mission Springs Water District (MSWD), certified an Environmental Impact Report (EIR) for the West Valley Water Reclamation Program for the construction of municipal wastewater collection and treatment systems that would facilitate the individual septic systems that overlie the Mission Creek aquifer. The planned program consisted of three components: construction of the Wright RWRF, construction of a conveyance system connecting existing sewered areas to the Wright RWRF, and construction of a collection system in an area MSWD refers to as M2. A prior cultural resources assessment (Tang and Hogan 2018) was completed for the planned components of the West Valley Water Reclamation Program at that time, including the Wright RWRF. In order to identify any "historical resources" for the proposed project, as defined by CEQA, which includes the RES-BCT and Wright RWRF site, Mojave Archaeological Consulting completed research that included an updated cultural resources records search at the South Coastal Information Center (SCIC), a search of the Native American Heritage Commission (NAHC) Sacred Lands File (SLF), tribal outreach, and a pedestrian field survey (**Appendix 4**).

In order to identify any "historical resources" as defined by CEQA, Mojave Archaeological Consulting reviewed background research, requested a new search of the Native American Heritage Commission (NAHC) Sacred Lands File (SLF) and a list of Native American contacts, conducted outreach with the Agua Caliente Band of Cahuilla Indians (ACBCI), and completed a pedestrian field survey. The investigation was carried out by Michelle Hart, M.A. Ms. Hart has more than 12 years of experience conducting cultural

resource studies and meets the Secretary of Interior's professional qualifications standards for archaeology, architectural history, and history.

On August 27, 2025, a pedestrian survey of the project site was completed. The survey included the entirety of both photovoltaic solar system locations. The survey was completed using linear transects spaced no more than 15 meters apart. All ground surfaces were closely inspected for any indications of cultural resources. To assess the potential for buried cultural deposits, soil profiles were examined at locations of animal burrows, drainages, disturbed areas, and other exposures. Ground visibility was generally excellent (greater than 90 percent). A large amount of modern trash was observed scattered throughout the survey area. In addition to the modern dumped garbage, several scattered isolated historic cans dating to ca. 1950's to the late 1970's were noted including aluminum top pull-tab beverage, church-key-opened steel body beverage, and one rectangular fuel can. Representative photographs were taken of the historic cans (included in Attachment B of **Appendix 4**) but they were not otherwise formally recorded in consideration that such isolated refuse items are extremely common in roadside settings, offer little information potential, and would not constitute "historical resources" for the purposes of CEQA.

Mojave Archaeological Consulting assessed the proposed project site for potentially significant cultural resources under CEQA. Specifically, CEQA guidelines state "historical resources" include resources listed in or determined to be eligible for listing in the California Register of Historical resources (or determined to be historically significant by the lead agency—generally, in cases where the resource would meet any of the criteria for listing on the California Register of Historical Resources). As discussed above, artifacts located during the survey were limited to a few dispersed cans dating from the mid-century through the late-1970's; these items are not considered to be "historical resources" for the purposes of CEQA. No other cultural resources, either prehistoric, or historic, were found within the project. Mojave Archaeological Consulting recommends to the Mission Springs Water District that the project will have no impact to historical or archaeological resources.

No further cultural resources work is recommended necessary for the proposed project activities. However, if buried cultural materials are encountered during construction, all work should be halted in the vicinity of the discovery until a qualified archaeologist can assess the significance and integrity of the find. If intact and significant archaeological remains are encountered, the impacts of the project should be mitigated appropriately. Additionally, Health and Safety Code Section 7050.5, CEQA Statute & Guidelines Section 15064.5(e), and PRC Section 5097.98 mandate the process to be followed in the event of the discovery of human remains.

Impact Analysis

a&b. *Less Than Significant With Mitigation Incorporated* – CEQA establishes that "a project that may cause a substantial adverse change in the significance of a historical resource is a project that may have a significant effect on the environment" (PRC §21084.1). "Substantial adverse change," according to PRC §5020.1(q), "means demolition, destruction, relocation, or alteration such that the significance of a historical resource would be impaired."

Per the above discussion and definition, no archaeological sites or isolates were recorded within the project boundaries; thus, no further consideration as part of this study is necessary. In light of this information and pursuant to PRC §21084.1, the following conclusions have been reached for the

project:

- No historical resources within or adjacent to the project area have any potential to be disturbed as they are not within the proposed area in which the facilities will be constructed and developed, and thus, the project as it is currently proposed will not cause a substantial adverse change to any known historical resources.
- No other cultural resources, either prehistoric, or historic, were found within the project.

There is a potential to encounter cultural materials; however, unknown buried cultural materials cannot be discovered until excavation and earthmoving take place, and may be discovered during earthmoving operations associated with the project. As such, the following mitigation measures shall be implemented:

CUL-1 ***Should any cultural resources be encountered during construction of these facilities, earthmoving or grading activities in the immediate area of the finds shall be halted and an onsite inspection shall be performed immediately by a qualified archaeologist. Responsibility for making this determination shall be with the District's onsite inspector. The archaeological professional shall assess the find, determine its significance, and make recommendations for appropriate mitigation measures within the guidelines of the California Environmental Quality Act.***

With the above mitigation measure, the potential for impacts to cultural resources will be reduced to a less than significant level. No additional mitigation is required.

c. *Less Than Significant Impact* – As noted in the discussion above, no available information suggests that human remains may occur within the Area of Potential Effect (APE) and the potential for such an occurrence is considered very low. Human remains discovered during the project will need to be treated in accordance with the provisions of HSC §7050.5 and PRC §5097.98, which is mandatory. State law (Section 7050.5 of the Health and Safety Code) as well as local laws requires that the Police Department, County Sheriff and Coroner's Office receive notification if human remains are encountered. Compliance with these laws is considered adequate mitigation for potential impacts. Thus, the potential for impact to discovery and treatment of human remains will be less than significant.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
VI. ENERGY: Would the project:				
a) Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operations?	☐	☐	☒	☐
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☒	☐

SUBSTANTIATION

Impact Analysis

a&b. *Less Than Significant Impact* – During construction, the proposed project will utilize construction equipment that is CARB approved, minimizing emissions generated and electricity required to the extent feasible (as outlined in Section III, Air Quality, above). As stated in Section III, Air Quality, the construction of the proposed Solar Facility Project would require compliance with regulatory requirements to minimize emissions impacts from construction equipment not in use. These regulatory requirements also apply to energy resources as they require equipment not in use for 5 minutes to be turned off, and for electrical construction equipment to be used where available. for five minutes to be turned off, and for electric equipment to be used where available. These regulatory requirements would prevent a significant impact during construction due to wasteful, inefficient, or unnecessary consumption of energy resources, and would also conform to the CARD regulations regarding energy efficiency.

Southern California Edison Company (SCE) is the primary distribution provider for electricity in the project area. According to the City of Desert Hot Springs General Plan Environmental Impact Report (General Plan EIR), in the 2018 fiscal year, SCE sold approximately 87,143 million kilowatt hours (kWh) of electricity; approximately 46% of the electricity that SCE delivered to customers came from carbon-free resources, including solar energy (approximately 13%), wind energy (approximately 13%), and geothermal energy (approximately 8%). The City's General Plan EIR provides the following analysis related to new development under Chapter 4.6, Energy:

"New development and land use turn over would be required to comply with statewide mandatory energy requirements outlined in Title 24, Part 6, of the California Code of Regulations (the CalGreen Code), which would decrease estimated electricity consumption in new and/or retrofitted structures. Additional electricity reductions would be achieved through the implementation of Mitigation Measure GHG-1C, which requires the adoption of a Zero Net Energy (ZNE) ordinance. The adoption and implementation of a ZNE ordinance would require increased building efficiency and the installation of renewable energy infrastructure (e.g., photovoltaic (PV) systems and/or windmills) to offset the building/structure's energy consumption."

A ZNE ordinance has not yet been adopted by the City. Furthermore, the proposed project would be required to comply with Title 24, Part 6, of the California Code of Regulations (the CalGreen Code). Additionally, in July 2013, the City of Desert Hot Springs adopted an Energy Action Plan (EAP), to which the project will be required to adhere. Further, the operation of the solar panels will not require a new source of energy. This is because solar panels generate, and do not require, electricity, thus proving that the proposed project would contribute a new source of energy, and therefore would not result in wasteful, inefficient, or unnecessary consumption of energy resources during project operation. No natural gas would be required to operate the proposed project, and trips to the project footprint would occur only on an as needed basis for maintenance purposes. As such, energy consumption associated with implementation of the Solar Installation Project would not be considered unnecessary, inefficient, or wasteful.

According to SCE's website[6], SCE is committed to delivering power reliably and to meet demand; SCE is expanding and upgrading the transmission and distribution networks to meet the region's growing demand for electricity, and improve grid performance, while meeting California's ambitious renewable-power goals. As such, it is anticipated that SCE will continue to have ample power supply to serve the construction of the project without the need for additional electrical capacity. Therefore, given the lack of energy required to operate the proposed project, it is not anticipated that the project would either result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operations, or conflict with or obstruct a state or local plan for renewable energy or energy efficiency. Impacts under these issues are considered less than significant.

[6] SCE, 2025. Meeting Demand. https://www.sce.com/about-us/reliability/meeting-demand (07/08/25)

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
VII. GEOLOGY AND SOILS: Would the project:				
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 onsite or offsite landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☒	☐	☐
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	☒	☐
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where RWs are not available for the disposal of wastewater?	☐	☐	☐	☒
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☒	☐	☐

SUBSTANTIATION: Geotechnical Investigations were prepared by Salem Engineering Group, Inc. for both the RES-BCT and RWRF sites. These documents are provided as **Appendices 5a and 5b**.

Impact Analysis

a. i. Ground Rupture

Less Than Significant Impact – The project footprint is located in the City of Desert Hot Springs

within the County of Riverside, which is situated proximate to several active faults, including the North and South Branches of the San Andreas fault, which are considered to be Alquist-Priolo fault zones, as well as the Garnet Hill Fault, which is a Riverside County Designated Fault Zone. **Figure VII-1** shows where these faults are located as depicted in the City of Desert Hot Springs General Plan, which depicts faults within the City boundary as well as within and around its Sphere of Influence. According to **Figure VII-1**, the project footprint is located within an Alquist-Priolo fault zone. Note that the RES-BCT site is located within the Alquist-Priolo fault zone, but the RWRF site is located outside of the fault zone. This is confirmed by the data contained in the Geotechnical Reports provided as **Appendices 5a and 5b**.

The Geotechnical Report for the RES-BCT site concluded the following: Based on the proximity to mapped fault traces, fault rupture hazard could be a concern for the subject site. The AP Zoning Act [PRC 2621.5(b) and 2321.6 (a)] is intended for improvements intended for human occupancy or where loss of human life should be considered. Furthermore, 2022 CBC, Chapter 3, Section 312 categorizes solar systems and carport structures to have an accessory characterization and would fall under occupancy category Group U, "Utility and Miscellaneous", where the potential for life hazard is considered incidental to their occupancy. Therefore, evaluation of fault rupture hazards is not required by the current California Building Code or Public Resource Code. This is because the potential for harm to humans from installation of such uses within Alquist-Priolo fault zones is minimal in the event of fault rupture. As a result, and based on the conclusions found in the Geotechnical Reports, fault rupture impacts would be less than significant without the need for mitigation.

ii. Strong Seismic Ground Shaking

Less Than Significant Impact – As stated in the discussion above, several faults run through the City, and as with much of southern California, the proposed project will be subject to strong seismic ground shaking impacts should any major earthquakes occur in the future, particularly due to the site's location within a fault zones, as shown in **Figure VII-2**. Construction of the proposed solar facilities would be temporary, and would be developed outdoors. Construction workers would generally only be at risk when working indoors. This is because seismic ground shaking may cause structural damage that could affect persons inside structures to be exposed to risk associated with strong seismic ground shaking when indoors or atop a roof of a structure. Overall, construction would be temporary in nature and the probability of seismic ground shaking during construction is low. Thus, construction impacts would be less than significant.

The potential impacts to solar facilities due to strong seismic ground shaking consists of damage to panels, with minimal potential harm to humans unless a person is near or beneath the panels damaged by the ground shaking. The California Professional Engineers Act (Building and Professions Code Sections 6700-6799) and the Codes of Professional Conduct, as administered by BPELS, provide the basis for regulating and enforcing engineering practice in California. Many such facilities exist and function within areas susceptible to strong ground shaking effects. Further, as discussed under issue (a[ii]) above, evaluation of fault rupture hazards is not required by the current California Building Code or Public Resource Code. This is because the potential for harm to humans from installation of such uses within Alquist-Priolo fault zones is minimal in the event of fault rupture or strong seismic groundshaking. Therefore, given that no habitable structures will be developed in support of the proposed project, there is a less than significant potential for people or structures to

be exposed to strong seismic ground shaking.

iii. Seismic-Related Ground Failure Including Liquefaction

Less Than Significant Impact – The three factors determining whether a site is likely to be subject to liquefaction include seismic shaking, type and consistency of earth materials, and groundwater level. Liquefaction of saturated cohesionless soils can be caused by strong ground motion resulting from earthquakes. Soil liquefaction is a phenomenon in which saturated, cohesionless soils lose their strength due to the build-up of excess pore water pressure during cyclic loading such as that induced by earthquakes. According to the City of Desert Hot Springs General Plan Seismic Hazards Map (**Figure VII-2**), the project site is located within an area known to be susceptible to liquefaction. However, the data contained in the Geotechnical Reports provided as **Appendices 5a and 5b** indicates that the County hazard map states "no groundwater data but, sediments susceptible to liquefaction," and due to the lack of groundwater in the upper 50 feet the potential for liquefaction to occur is low. However, dry seismic settlement may occur due to a design level earthquake event. As with other ground failure potential, solar installations are not susceptible to significant adverse effects associated with liquefaction. Damage to solar panels can occur, but can be the solar panels repaired and placed back into operation with no loss of human life. Therefore, potential impacts associated with seismic-related ground failure would be considered less than significant. No mitigation is required.

iv. Landslide

Less Than Significant Impact – According to the City of Desert Hot Springs General Plan EIR, Landslides are found along the perimeter of the City on properties abutting the surrounding hills and mountains. The proposed project footprint is located in the southern portion of the City near the I-10 and is in a relatively flat area. Further, the data contained in the Geotechnical Reports provided as **Appendices 5a and 5b** indicates that there are no known landslides located at the site, nor is the site in the path of any known or potential landslides. Based on the relatively flat nature of the site, the potential for a landslide would not pose a hazard to the project development. Thus, the project appears to be located within an area of low susceptibility to landslides. Therefore, potential impacts associated with landslides are considered less than significant. No mitigation is required.

b. *Less Than Significant With Mitigation Incorporated* – The proposed Solar Development Project will result in land disturbance within vacant land and adjacent rights-of-way to accommodate the footprint necessary to conduct construction of the solar facilities. Overall existing drainage patterns will remain in place once the solar panels and transmission lines are installed. This project will result in the disturbance of more than one acre of land and will require filing a Notice of Intent (NOI), securing a National Pollutant Discharge Elimination System (NPDES), general construction stormwater discharge permit, and preparation and implementation of a Stormwater Pollution Prevention Plan (SWPPP). The SWPPP will include but not be limited to the following measures to mitigate potential impacts associated with erosion and surface water quality degradation during construction:

GEO-1 Stored backfill material shall be covered with water resistant material during periods of heavy precipitation to reduce the potential for rainfall erosion of stored backfill

material. Where covering is not possible, measures such as the use of straw bales or sand bags shall be used to capture and hold eroded material on the project site for future cleanup such that erosion does not occur.

GEO-2 Excavated areas shall be backfilled and compacted such that erosion does not occur.

GEO-3 All exposed, disturbed soil (trenches, stored backfill, etc.) will be sprayed with water or soil binders twice a day or more frequently if fugitive dust is observed migrating from the site within which the project is being installed.

With implementation of the above mitigation measures, any impacts are considered less than significant. No further mitigation is necessary.

c. *Less Than Significant With Mitigation Incorporated* – As stated under issues VII(a[iii]) and VII(a[iv]) above, the project footprint does is not located within an area that is susceptible to landslides. However, the data contained in the Geotechnical Reports provided as **Appendices 5a and 5b** indicates that the County hazard map states "no groundwater data but, sediments susceptible to liquefaction," and due to the lack of groundwater in the upper 50 feet the potential for liquefaction to occur is low. However, dry seismic settlement may occur due to a design level earthquake event. The Desert Hot Springs General Plan indicates that over drafting of groundwater, drainage of organic soils, underground mining, natural compaction, and thawing of permafrost can cause subsidence. None of these phenomena occur at the project site such that subsidence is likely to occur within the project footprint. According to the Geotechnical Reports provided as **Appendices 5a and 5b,** lateral spreading is a phenomenon in which soils move laterally during seismic shaking and is often associated with liquefaction. The amount of movement depends on the soil strength, duration and intensity of seismic shaking, topography, and free face geometry. Due to the relative flat site topography, the likelihood of lateral spreading is low. Soils in some areas are also subject to collapse if oversaturated; as the soils within the project footprint are not oversaturated, the potential for collapse is low. As stated under issues VII(a[iii]) and VII(a[iv]) above, damage to solar panels from soil instability can occur, but can be repaired and placed back into operation with no loss of human life. The District would be required to adhere to the design recommendations found in **Appendices 5a and 5b** through the implementation of **MM GEO-4**, which would enforce the design recommendations presented in the Geotechnical Investigations as requirements to ensure that soil expansion and other geotechnical constraints/hazards are minimized to a level of less than significant.

GEO-4 Based upon the geotechnical investigation (Appendices 5a and 5b of this document), all of the recommended design parameters identified in Appendices 5a and 5b shall be implemented by the Developer. Implementation of these specific measures will address all of the identified geotechnical constraints identified at project site, including seismic ground shaking.

Thus, the project will have a less than significant potential to 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 onsite or offsite landslide, lateral spreading, subsidence, liquefaction or collapse.

d. *Less Than Significant Impact* – The entirety of the proposed project will be located within vacant sites adjacent to existing solar panels. According to the Geotechnical Investigations (**Appendices 5a and 5b**), near-surface material consists of alluvial fan deposits of sand, silt, gravel, and cobbles derived from erosion of the Mesozoic granitic and metamorphic rocks of the adjacent San Jacinto Mountains. The project sites are underlain by Quaternary age (Holocene Sediments) alluvial deposits mainly comprised of Alluvial sand, and gravelly sand of valley (Qa). The sediments in the project area exposed during the subsurface exploration are generally similar to those mapped in the vicinity of the site, indicate the surface soils consist of various admixtures of sand and silts with various gravel percentages, the Holocene deposits underlain by unconformity of older Pleistocene alluvial fan gravels, sand, cobbles and boulders. The Geotechnical Investigations (**Appendices 5a and 5b**), indicate that an expansion index test performed on a near surface soil sample resulted in an expansion index of 0 (very low expansion potential) at both sites. Given the above, the proposed project would have a less than significant potential to be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property.

e. *No Impact* – The proposed project includes the installation of solar arrays and associated transmission line. No septic systems or alternative wastewater disposal systems are proposed as part of the project. Thus, no impacts related to the use of septic tanks or alternative water disposal systems will occur.

f. *Less Than Significant With Mitigation Incorporated* – The potential for discovering paleontological resources during development of the project is possible, but not expected. If previously unknown potentially unique paleontological resources are uncovered during excavation or construction of the development, significant impacts could occur. Thus, even with a low potential for encountering subsurface paleontological resources, it is necessary to incorporate contingency mitigation to ensure that accidental exposure of such resources is managed in a manner to protect the valuable information that can be gained from such exposure during construction. Mitigation would ensure that impacts to paleontological resources are reduced to a level of less than significant. Thus, because paleontological resources are located beneath the surface and can be discovered as a result of ground disturbance activities, the following measure shall be implemented:

GEO-5 ***Should any paleontological resources be encountered during construction of the project, earthmoving or grading activities in the immediate area of the finds shall be halted and an onsite inspection should be performed immediately by a qualified paleontologist. Responsibility for making this determination shall be with the MSWD's onsite inspector. The paleontological professional shall assess the find, determine its significance, and determine appropriate management measures within the guidelines of the California Environmental Quality Act that shall be implemented to minimize any impacts to a paleontological resource.***

The implementation of **MM GEO-5** would mitigate impacts to potentially significant paleontological resources through the creation of procedures to address circumstances in which such resources are uncovered during constriction. This would ensure that impacts under this issue are lowered to a level of less than significant.

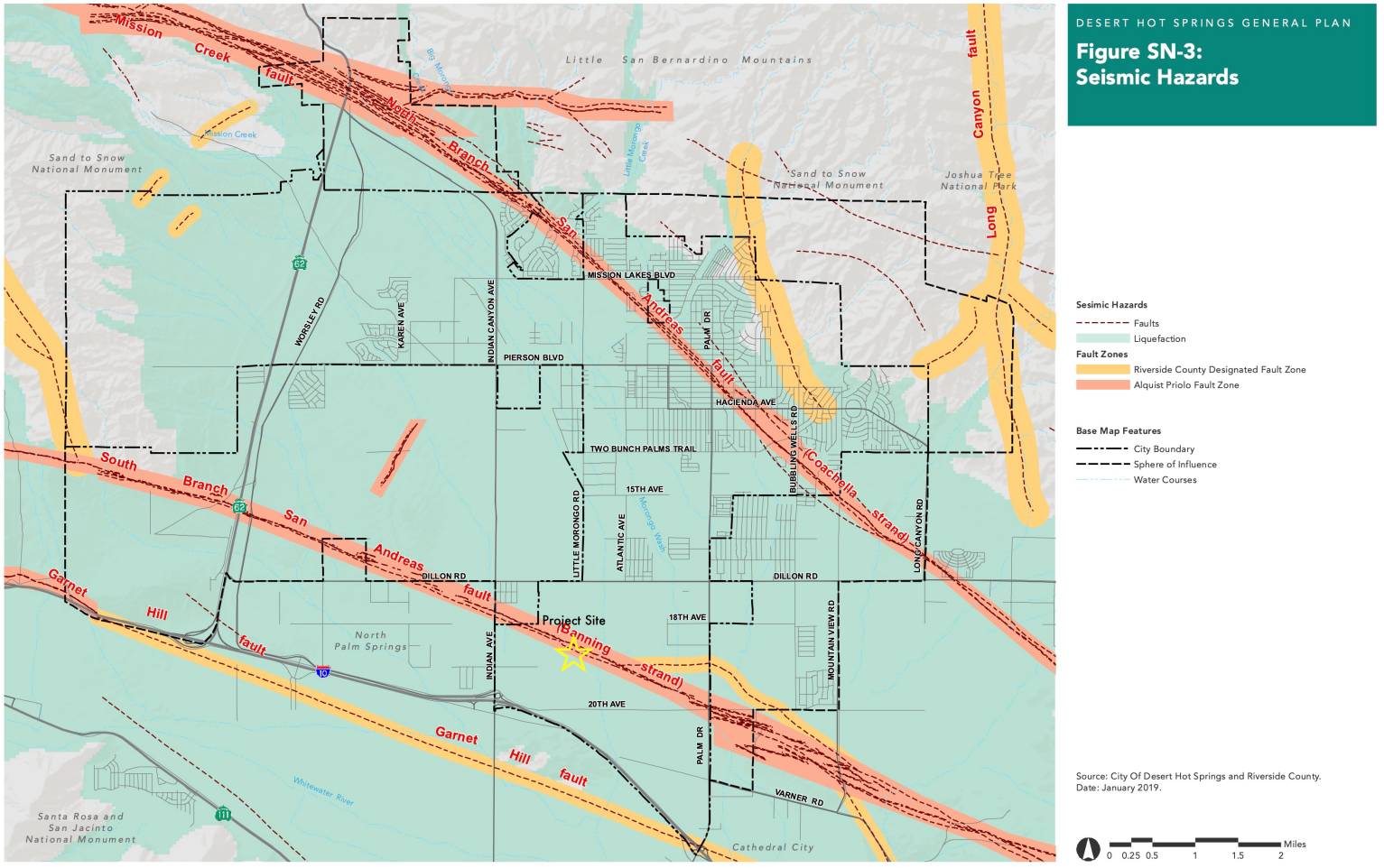

FIGURE VII-1

Tom Dodson & Associates
Environmental Consultant

City of Desert Hot Springs Seismic Hazards Map

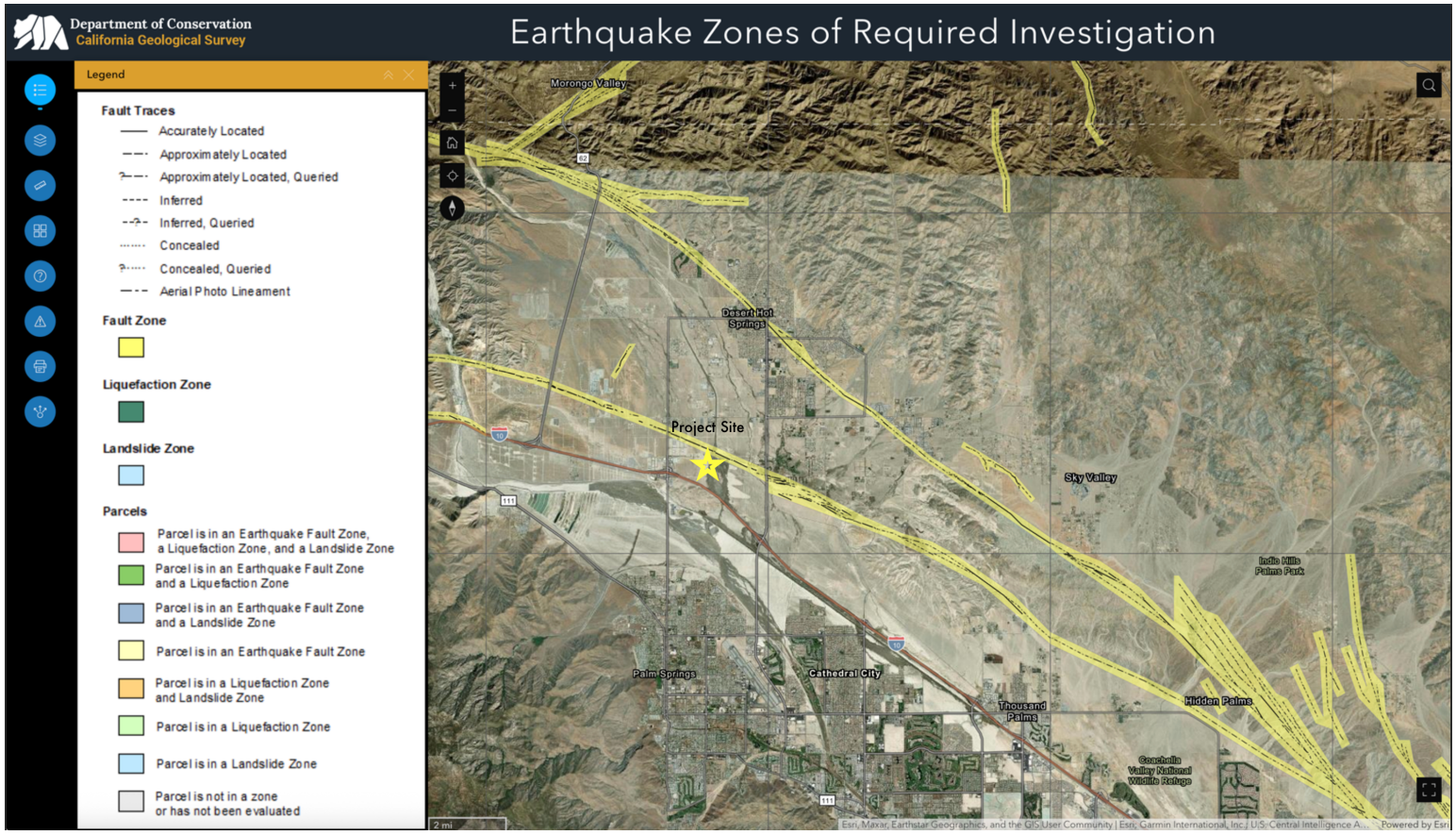

FIGURE VII-2

Tom Dodson & Associates
Environmental Consultants

Earthquake Zones of Required Investigation

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
VIII. GREENHOUSE GAS EMISSIONS: Would the project:				
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?	☐	☐	☒	☐

SUBSTANTIATION: The following information utilized in this section of the Initial Study was obtained from the following technical study: *Mission Springs Water District Well 33 Solar Project Air Quality & Greenhouse Gas Assessment prepared* by Urban Crossroads dated September 9, 2025. This technical study is provided as **Appendix 2** to this document.

Climate Change Setting

Global climate change (GCC) is the change in average meteorological conditions on the earth with respect to temperature, precipitation, and storms. The majority of scientists believe that the climate shift taking place since the Industrial Revolution is occurring at a quicker rate and magnitude than in the past. Scientific evidence suggests that GCC is the result of increased concentrations of GHGs in the earth's atmosphere, including carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), and fluorinated gases. The majority of scientists believe that this increased rate of climate change is the result of GHGs resulting from human activity and industrialization over the past 200 years.

An individual project like the proposed project evaluated in this memo cannot generate enough GHG emissions to affect a discernible change in global climate. However, the proposed project may participate in the potential for GCC by its incremental contribution of GHGs combined with the cumulative increase of all other sources of GHGs, which when taken together constitute potential influences on GCC. Because these changes may have serious environmental consequences, this memo will evaluate the potential for the proposed project to have a significant effect upon the environment as a result of its potential contribution to the greenhouse effect.

GCC refers to the change in average meteorological conditions on the earth with respect to temperature, wind patterns, precipitation and storms. Global temperatures are regulated by naturally occurring atmospheric gases such as water vapor, CO_2, N_2O, CH_4, hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF_6). These particular gases are important due to their residence time (duration they stay) in the atmosphere, which ranges from 10 years to more than 100 years. These gases allow solar radiation into the earth's atmosphere, but prevent radioactive heat from escaping, thus warming the earth's atmosphere. GCC can occur naturally as it has in the past with the previous ice ages.

Gases that trap heat in the atmosphere are often referred to as GHGs. GHGs are released into the atmosphere by both natural and anthropogenic activity. Without the natural GHG effect, the earth's

average temperature would be approximately 61 degrees Fahrenheit (°F) cooler than it is currently. The cumulative accumulation of these gases in the earth's atmosphere is considered to be the cause for the observed increase in the earth's temperature.

For the purposes of this analysis, emissions of CO_2, CH_4, and N_2O were evaluated because these gases are the primary contributors to GCC from development projects. Although there are other substances such as fluorinated gases that also contribute to GCC, these fluorinated gases were not evaluated as their sources are not well-defined and there are no accepted emissions factors or methodology to accurately calculate these gases.

Standards of Significance

According to the *CEQA Guidelines* Appendix G thresholds, to determine whether impacts from GHG emissions are significant. Would the project:

- **Threshold 1**: Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment?
- **Threshold 2**: Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs?

The evaluation of an impact under CEQA requires measuring data from a project against both existing conditions and a "threshold of significance." For establishing significance thresholds, the Office of Planning and Research's amendments to the *CEQA Guidelines* Section 15064.7(c) state "[w]hen adopting thresholds of significance, a lead agency may consider thresholds of significance previously adopted or recommended by other public agencies, or recommended by experts, provided the decision of the lead agency to adopt such thresholds is supported by substantial evidence."

CEQA Guidelines Section 15064.4(a) further states, ". . . A lead agency shall have discretion to determine, in the context of a particular project, whether to: (1) Use a model or methodology to quantify greenhouse gas emissions resulting from a project, and which model or methodology to use . . .; or (2) Rely on a qualitative analysis or performance-based standards."

CEQA Guidelines Section 15064.4 provides that a lead agency should consider the following factors, among others, in assessing the significance of impacts from greenhouse gas emissions:

- **Consideration #1:** The extent to which the project may increase or reduce greenhouse gas emissions as compared to the existing environmental setting.
- **Consideration #2:** Whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project.
- **Consideration #3:** The extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of greenhouse gas emissions. Such regulations or requirements must be adopted by the relevant public agency through a public review process and must reduce or mitigate the project's incremental contribution of greenhouse gas emissions. In determining the significance of impacts, the lead agency may consider a project's consistency with the State's long-term climate goals or strategies, provided that substantial evidence supports the agency's analysis of how those goals

or strategies address the project's incremental contribution to climate change and its conclusion that the project's incremental contribution is not cumulatively considerable.

Establishment of Significance Thresholds

Neither Mission Springs Water District nor the City of Desert Hot Springs has not adopted its own numeric threshold of significance for determining impacts with respect to GHG emissions. A screening threshold of 3,000 MTCO2e/yr to determine if additional analysis is required is an acceptable approach for small projects. This approach is a widely accepted screening threshold used by the District, City of Desert Hot Springs and numerous cities in the SSAB and is based on the SCAQMD staff's proposed GHG screening threshold for stationary source emissions for non-industrial projects, as described in the SCAQMD's Interim CEQA GHG Significance Threshold for Stationary Sources, Rules and Plans ("SCAQMD Interim GHG Threshold"). The SCAQMD Interim GHG Threshold identifies a screening threshold to determine whether additional analysis is required. As noted by the SCAQMD:

"…the…screening level for stationary sources is based on an emission capture rate of 90% for all new or modified projects...the policy objective of [SCAQMD's] recommended interim GHG significance threshold proposal is to achieve an emission capture rate of 90% of all new or modified stationary source projects. A GHG significance threshold based on a 90% emission capture rate may be more appropriate to address the long-term adverse impacts associated with global climate change because most projects will be required to implement GHG reduction measures. Further, a 90% emission capture rate sets the emission threshold low enough to capture a substantial fraction of future stationary source projects that will be constructed to accommodate future statewide population and economic growth, while setting the emission threshold high enough to exclude small projects that will in aggregate contribute a relatively small fraction of the cumulative statewide GHG emissions. This assertion is based on the fact that [SCAQMD] staff estimates that these GHG emissions would account for slightly less than 1% of future 2050 statewide GHG emissions target (85 [MMTCO2e/yr]). In addition, these small projects may be subject to future applicable GHG control regulations that would further reduce their overall future contribution to the statewide GHG inventory. Finally, these small sources are already subject to [Best Available Control Technology] (BACT) for criteria pollutants and are more likely to be single-permit facilities, so they are more likely to have few opportunities readily available to reduce GHG emissions from other parts of their facility."

Thus, and based on guidance from the SCAQMD, if a non-industrial project would emit GHGs less than 3,000 MTCO2e/yr, the project is not considered a substantial GHG emitter and the GHG impact is less than significant, requiring no additional analysis and no mitigation. Conversely, if a non-industrial project would emit GHGs in excess of 3,000 MTCO2e/yr, then the project could be considered a substantial GHG emitter, requiring additional analysis and potential mitigation. As previously discussed, a screening threshold of 3,000 MTCO2e/yr is an acceptable approach for small projects to determine if additional analysis is required and is therefore applied for this project.

Impact Analysis

a. *Less Than Significant Impact* – The estimated GHG emissions for the project land use are summarized in Table VIII-1. The estimated GHG emission includes emissions from Carbon Dioxide (CO2), Methane (CH4), Nitrous Oxide (N2O), and Refrigerants (R). As shown in Table VIII-1, the project would generate a total of approximately 5.67 MTCO2e/yr. Detailed model outputs for the

proposed project are presented in Attachment A of **Appendix 2**.

Table VIII-1: Emissions (Metric Tons CO_2e)

Source	Emissions (MT/year)				
	CO_2	CH_4	N_2O	Refrigerants	Total CO_2e
Annual construction-related emissions amortized over 30 years	168.00	0.01	<0.05	0.03	170.00
Solar Generation	-1,478.12	-0.14	-0.02	0	-1,486.74
Total CO_2e (All Sources)	**5.67**				

As shown in Table VIII-1, the project will result in approximately 5.67 $MTCO_2e$/yr; the proposed project would not exceed the City's screening threshold of 3,000 $MTCO_2e$/yr. Thus, the project would not have the potential to result in a cumulatively considerable impact with respect to GHG emissions and project GHG emissions would have a less than significant impact.

b. *Less Than Significant Impact* – Pursuant to 15604.4 of the CEQA Guidelines, a lead agency may rely on qualitative analysis or performance-based standards to determine the significance of impacts from GHG emissions.

The 2022 Scoping Plan for Achieving Carbon Neutrality (2022 Scoping Plan) lays out a path to achieve targets for carbon neutrality and reduce anthropogenic GHG emissions by 85% below 1990 levels no later than 2045, as directed by Assembly Bill 1279. The actions and outcomes in the plan will achieve significant reductions in fossil fuel combustion by deploying clean technologies and fuels, further reductions in short-lived climate pollutants, support for sustainable development, increased action on natural and working lands to reduce emissions and sequester carbon, and the capture and storage of carbon.

The project is consistent with the applicable policies specified for the project area in SCAG's Sustainable Community Strategy/Regional Transportation Plan, which pursuant to SB 375 calls for the integration of transportation for achievement of the GHG-emissions target for the region. Thus, a less than significant impact related to GHG emissions from project construction and operation would occur and no mitigation is required.

This project involves the construction of alternative electricity generation facilities through two new solar arrays by MSWD in the City of Desert Hot Springs. The project has been designed to align with the goals of the City's CAP. Sustainable construction practices will be implemented to minimize environmental impact and reduce GHG emissions. Measures will be taken to protect local ecosystems and engage with the community to address any concerns. By adhering to the CAP's objectives, this project aims to contribute positively to the City's sustainability goals while ensuring the efficient delivery of essential services.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
IX. HAZARDS AND HAZARDOUS MATERIALS: Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☒	☐	☐
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☒	☐	☐
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?	☐	☐	☐	☒

SUBSTANTIATION

Impact Analysis

a&b. *Less Than Significant With Mitigation Incorporated* – The project should not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials; but it may 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 during construction. During construction, there is a potential for accidental release of

petroleum products in sufficient quantity to pose a significant hazard to people and the environment. The following mitigation measure will be incorporated into the SWPPP prepared for the project and it would reduce potentially significant hazard impacts to a less than significant level:

HAZ-1 ***All accidental spills or discharge of hazardous material during construction activities shall be reported to the Certified Unified Program Agency and shall be remediated in compliance with applicable state and local regulations regarding cleanup and disposal of the contaminant released. The contaminated waste will be collected and disposed of at an appropriately a licensed disposal or treatment facility. This measure shall be incorporated into the SWPPP prepared for the proposed project. Prior to accepting the site as remediated, the area contaminated shall be tested to verify that any residual concentrations meet the standard for future residential or public use of the site.***

Additionally, roadways adjacent to the project footprint are public roads that can be used by any common carrier to or from the local area. For such transporters, the existing regulatory mandates ensure that the hazardous materials and any hazardous wastes transported to and from the project site will be properly managed. These regulations are codified in Titles 8, 22, and 26 of the California Code of Regulations. For example, maintenance trucks for construction equipment must transport their hazardous materials in appropriate containers, such as tanks or other storage devices. In addition, the haulers must comply with all existing applicable federal, state and local laws and regulations regarding transport, use, disposal, handling and storage of hazardous wastes and material, including storage, collection and disposal. Compliance with these laws and regulations related to transportation will minimize potential exposure of humans or the environment to significant hazards from transport of such materials and wastes. Impacts are therefore less than significant with mitigation incorporated.

c. *Less Than Significant Impact* – The proposed project will not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. No existing or proposed schools are located within this distance of the project. As previously stated, the project will involve the use of petroleum products and exhaust emissions with construction activities, but will be minimal, as stated under the Air Quality Section of this document. The handling of all hazardous or potentially hazardous materials during construction would comply with all applicable federal, state, and local agencies and regulations pertaining to the handling and use of hazardous materials. Adherence to these policies and regulations will ensure that the project will not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste, and further, as no schools are located within one-quarter mile of the project, hazards related to school proximity would not occur during either construction or operation of the proposed project. Any impacts under this issue are considered less than significant, and no mitigation is required.

d. *Less Than Significant Impact* – The proposed project footprint is not located in an area that has been included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result it will not create a significant hazard to the public or environment. According to the California State Waterboard's GeoTracker, which provides information regarding Leaking Underground Storage Tanks, there are no locations within a 2,500 foot radius of any of the proposed

project facilities that is identified as Leaking Underground Storage Tank (LUST) site or Department of Toxic Substances Control (DTSC) site (**Figure IX-1** see GeoTracker figure), nor are there any remediated LUST or DTS cleanup sites. Furthermore, the nature of the proposed project is not such that persons working or residing in the area would be exposed to any hazards from any nearby contaminated sites. Further, the proposed use would not be exposed to any contamination because the proposed solar facility transmission lines would not extend more than a few feet below the ground surface. Therefore, the proposed Solar Development Project is not anticipated to create a significant hazard to the population or to the environment from their implementation. Impacts are considered less than significant. No mitigation is required.

e. *No Impact* – According to a review of Google Maps (June 25, 2025), the closest public airport to the project site is the Palm Springs Airport, which is located approximately 5 miles to the southwest of the proposed site. The proposed project footprint is not located within an Influence Area identified in the Palm Springs International Airport section of the Riverside County Airport Land Use Commission's Compatibility Plan.[7] Given the large distance between the proposed project and nearby airports, project implementation would not result in a safety hazard for people residing or working in the project area. Furthermore, there are no private airstrips/public use airports located within two miles of the project site. Therefore, the development of the proposed Solar Development Project would have no potential to result in a safety hazard or excessive noise for people residing or working in the project area.

f. *Less Than Significant With Mitigation Incorporated* – The proposed project will be located within vacant sites surrounding existing solar development within the City of Desert Hot Springs. The proposed Solar Development Project will not be developed adjacent to any identified emergency response or evacuation route. Primary roadways within the project footprint that would be used during an emergency or evacuation order would be Dillon Road (north) and Indian Avenue (west). The proposed project would not be installed within these major roadways. A limited potential to interfere with an emergency response or evacuation plan will occur during construction. At no time during the installation of the proposed solar panels and associated transmission lines will the entirety of either 19th Street or Little Morongo Road be closed. The project would close one lane at a time, which would allow for through-traffic so long as a traffic management plan is developed and implemented; without the implementation of a traffic management plan, impacts could be significant and unavoidable. As such, please refer to the Transportation/Traffic Section of this document, Section XVII. **MM TRAN-1** shall be implemented to address any potential traffic disruption and emergency access issues on area roadways. Impacts are reduced to a less than significant level with mitigation incorporated. No additional mitigation is required.

g. *No Impact* – The proposed project would not expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands. The proposed project area is located within the southern portion of the City of Desert Hot Springs, as such, the project is not located within or adjacent to a fire hazard zone (**Figure IX-2**). The project will not construct any habitable structures.

[7] Riverside County, 2005. *Riverside County Airport Land Use Compatibility Plan Policy Document.* https://rcaluc.org/sites/g/files/aldnop421/files/migrated/Portals-13-PDFGeneral-plan-newplan-18--20Vol.-201-20Palm-20Springs-20International.pdf (Accessed 07/19/25)

The proposed project site is not located within or in the vicinity of a high wildland fire hazard zone. No impacts are anticipated and no mitigation is required.

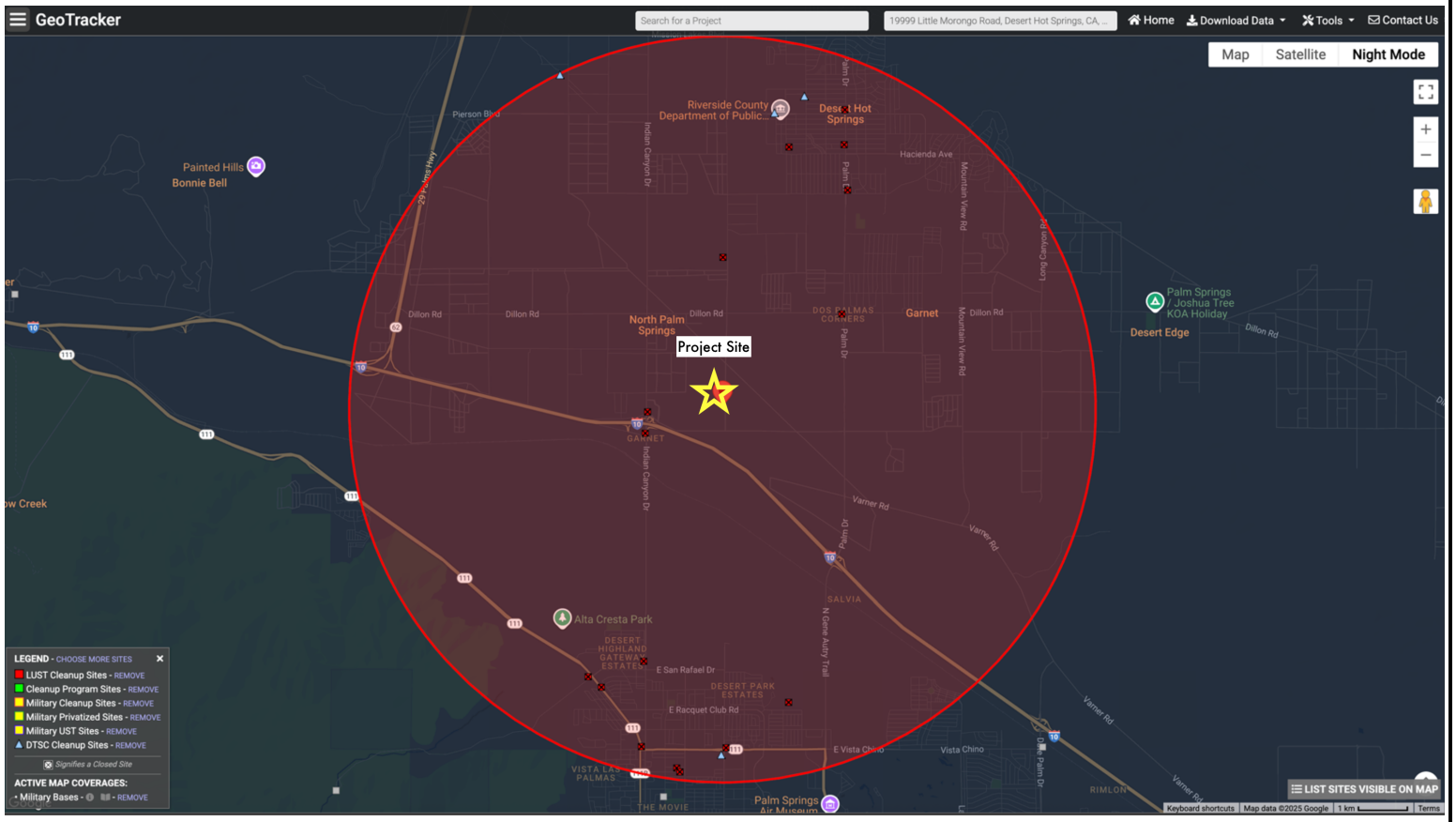

FIGURE IX-1

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GeoTracker Map

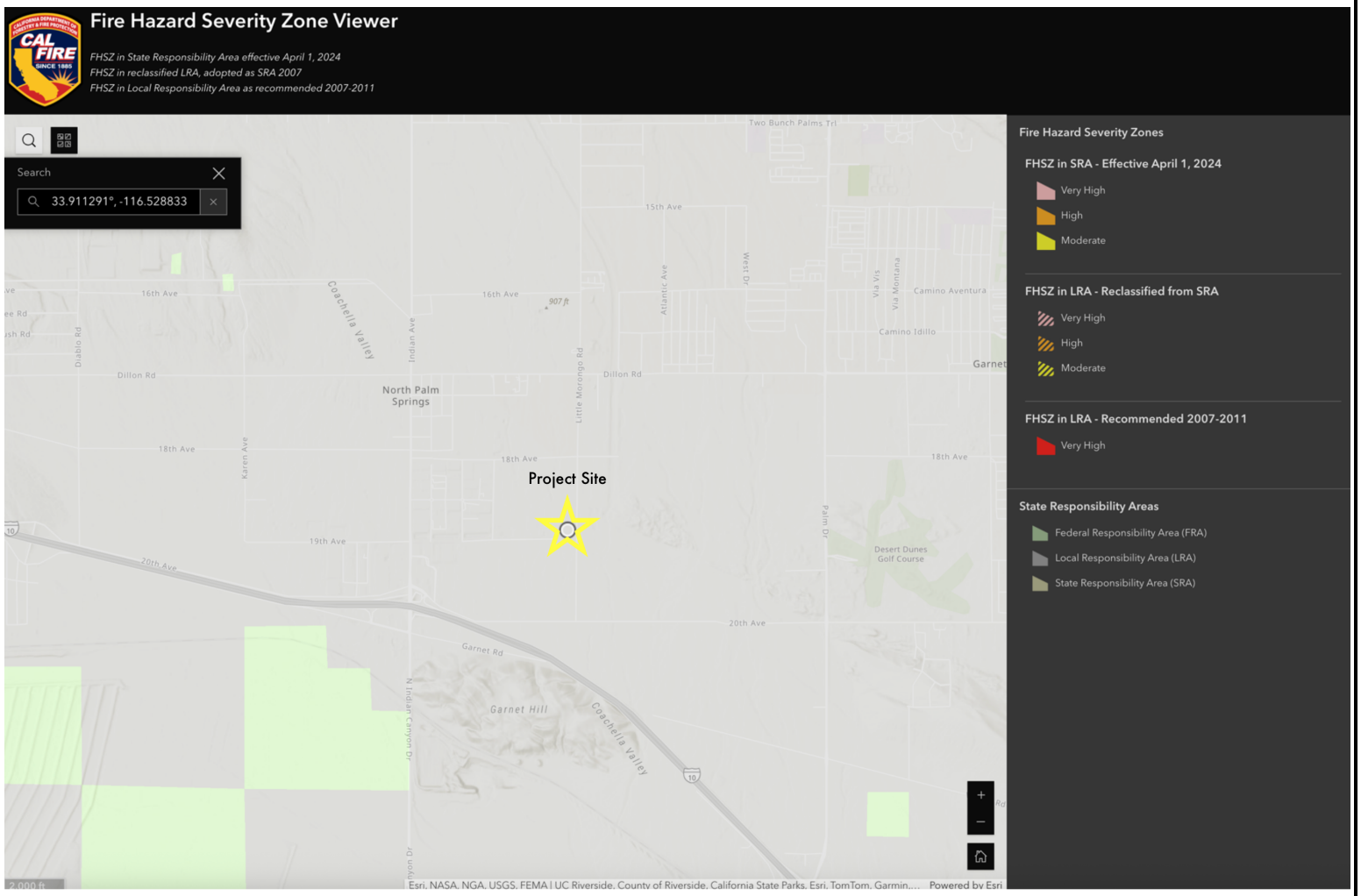

FIGURE IX-2

Tom Dodson & Associates
Environmental Consultants

CalFire Fire Hazard Severity Zones

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
X. HYDROLOGY AND WATER QUALITY: Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?	☐	☒	☐	☐
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such the project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
(i) result in substantial erosion or siltation onsite or offsite?	☐	☒	☐	☐
(ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding onsite or offsite?	☐	☒	☐	☐
(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?	☐	☐	☒	☐

SUBSTANTIATION

Impact Analysis

a. *Less Than Significant With Mitigation Incorporated* – The proposed project will install a solar photovoltaic facility to meet overall energy demands. The area of disturbance from the construction and site preparation of the solar sites will occur within vacant sites containing native desert vegetation. Three main sources of potential violation of water quality standards or waste discharge requirements are as follows: from generation of municipal wastewater; from stormwater runoff; and

potential discharges of pollutants, such as accidental spills. To address stormwater and accidental spills within this environment, any new project must ensure that site development implements a Storm Water Pollution Prevention Plan (SWPPP) to control potential sources of water pollution that could violate any standards or discharge requirements during construction and a Water Quality Management Plan (WQMP) to ensure that project-related surface runoff meets discharge requirements over the short- and long-term. In the short term, construction activities will have some potential to affect the quality of stormwater discharged from the project site. Land disturbance activities could result in erosion and sedimentation immediately adjacent to the disturbed project alignment. Spills or leaks of petroleum products used by construction equipment could also potentially affect the quality of surface water. The project will be required to obtain a general construction National Pollutant Discharge Elimination System (NPDES) stormwater discharge permit prior to the start of construction. Obtaining coverage under the General Construction NPDES permit requires the preparation and implementation of the SWPPP, which specifies Best Management Practices (BMPs) that must be implemented during construction of this specific project. Compliance with the terms and conditions of the NPDES and the SWPPP, as well as the WQMP, is mandatory and is judged adequate mitigation by the regulatory agencies for potential impacts to stormwater during construction activities. Implementation of the following mitigation measure would also further reduce potential impacts to stormwater runoff to a less than significant level.

HYD-1 ***MSWD shall require that the construction contractor prepare and implement a Storm Water Pollution Prevention Plan (SWPPP) which specifies Best Management Practices (BMPs) that will prevent all construction pollutants from contacting stormwater and with the intent of keeping all products of erosion from moving offsite into receiving waters. The SWPPP shall include a Spill Prevention and Cleanup Plan that identifies the methods of containing, cleanup, transport and proper disposal of hazardous chemicals or materials released during construction activities that are compatible with applicable laws and regulations. BMPs to be implemented in the SWPPP may include but not be limited to:***

- ***The use of silt fences;***
- ***The use of temporary stormwater desilting or retention basins;***
- ***The use of water bars to reduce the velocity of stormwater runoff;***
- ***The use of wheel washers on construction equipment leaving the site;***
- ***The washing of silt from public roads at the access point to the site to prevent the tracking of silt and other pollutants from the site onto public roads;***
- ***The storage of excavated material shall be kept to the minimum necessary to efficiently perform the construction activities required. Excavated or stockpiled material shall not be stored in water courses or other areas subject to the flow of surface water; and***
- ***Where feasible, stockpiled material shall be covered with waterproof material during rain events to control erosion of soil from the stockpiles.***

Otherwise, the future proposed solar facilities on the project site do not include activities that will generate wastewater or violate water quality standards or waste discharge requirements. Maintenance of the proposal project would include routine cleaning by robot or by hand, as well as inspections and potential panel replacement. No on site structures are proposed, as the facilities is

proposed to be unmanned. With implementation of these mandatory Plans and their BMPs, as well as **MMs HAZ-1** and **HYD-1** above, the development of the proposed project will not cause a violation of any water quality standards or waste discharge.

b. *Less Than Significant Impact* – The project would be installed within the Indio and Mission Creek Subbasins of the Coachella Valley Groundwater Basin (**Figure X-1**). The project does not propose the installation of any water wells that would directly extract groundwater. The project would not involve the installation of concrete building foundations or other structures that would obstruct groundwater recharge at the solar facility locations. The project would utilize water from the District's existing supply for onsite dust control. The District's water supply source is 100 percent groundwater produced from District-owned and operated wells. Over the approximately 40 day site preparation and ground disturbance period during construction, the project is expected to use about 5,000 gallons of potable water each day which equates to the installation of the paved roadway requiring up to 200,000 gallons of water (0.61-acre feet) during construction. Additionally, up to 200,000 gallons of water per year (0.61-acre feet) may be required in support of cleaning the solar panels as part of project operation. This amount is considered nominal when compared to the availability of supply when compared to demand from the project proponent, MSWD, based on a review of the 2020 Coachella Valley Regional Urban Water Management Plan (UWMP).[8] Thus, based on the estimated water required to support the solar facilities, this project has no potential to cause a cumulatively considerable adverse impact on the regional groundwater resources. Therefore, the project is not anticipated to substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level. Therefore, impacts under this issue are considered less than significant and no mitigation is required.

c.

(i-iii). *Less Than Significant With Mitigation Incorporated* – The project site does not presently contribute to existing or planned stormwater drainage systems. Compliance with the NPDES and SWPPP would be required. Each of these permits and plans would require the implementation of BMPs that manage overland runoff from construction sites and establish permanent drainage pathways to stabilized outlets. Through compliance with conditions of required permits governing stormwater runoff from construction sites, this project will not substantially alter the existing drainage pattern of the site or area; will not substantially alter the course of a stream or river in such a manner that will result in substantial erosion or siltation either on or off the project footprint; or contribute runoff water that could exceed the capacity of the existing drainage facilities.

During operation of the proposed Solar Development Project, the presence of new facilities at the site and changes in the extent of permeable or impermeable surfaces could alter the direction and volume of overland flows during both wet and dry periods. However, the proposed project would not substantially change the drainage pattern of the site given that the ground mounted solar would not substantially reduce the amount of permeable surface onsite. If overland flows and drainage at the Solar Development Project sites are not assessed and drainage facilities are not designed such

[8] Coachella Valley Water District et. Al., 2021. 2020 Coachella Valley Regional Urban Water Management Plan. https://www.cvwd.org/DocumentCenter/View/5482/Coachella-Valley-RUWMP (Accessed 07/21/25)

that no net increase in runoff would occur, a significant potential for runoff related impacts during operation could occur. Thus, in order to avoid a potentially significant impact, mitigation to address this issue is required. Implementation of drainage improvements within the project site during construction will ensure that, during operation, no substantial increase the rate or amount of surface runoff in a manner that would result in 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 would occur, and impacts are minimized to a less than significant level. As required by **MM HYD-2**, either surface runoff shall be collected and retained or a grading and drainage plan would be developed during project design and implemented to ensure no increase in offsite discharges would occur and no substantial increase in erosion or sedimentation would occur, thereby avoiding potentially significant impacts under this issue.

HYD-2 ***Prior to commencement of construction, the District shall be required to either:***
(1) Prepare a No Net Discharge Report demonstrating that within each facility surface runoff shall be collected and retained (for use onsite) or detained and percolated into the ground on the site such that site development results in no net increase in offsite stormwater flows. Detainment shall be achieved through Low Impact Development techniques whenever feasible, and shall include techniques that remove the majority of urban storm runoff pollutants, such as petroleum products and sediment. The purpose of this measure is to remove the onsite contribution to cumulative urban storm runoff and ensure the discharge from the sites is treated to reduce contributions of urban pollutants to downstream flows and to groundwater; or, where it is not feasible to eliminate stormwater flows off of a site or where otherwise appropriate, the implementing agency shall:
(2) Prepare a grading and drainage plan that identifies anticipated changes in flow that would occur on site and minimizes any potential increases in discharge, erosion, or sedimentation potential in accordance with applicable regulations and requirements for the County of Riverside. In addition, all new drainage facilities shall be designed in accordance with standards and regulations. The plan shall identify and implement retention basins, BMPs, and other measures to ensure that potential increases in storm water flows and erosion would be minimized, in accordance with local requirements.

MM HYD-2 is required to address the potential for the project to create or contribute runoff that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. Impacts would be less than significant with mitigation incorporated.

(iv). *No Impact* – According to the City of Desert Hot Springs General Plan Flood Hazard Map (**Figure X-2**), the proposed project is located within Zone X (areas of 0.2% annual change flood (500-year flood); and areas of 1% annual chance flood with average depths of less than 1 foot or with drainage areas less than 1 square mile; and areas protected by levees from 1% annual flood chance. The proposed project would install solar facilities, but involve little to no alteration to the ground surface itself. Therefore, there would be little to no change to the flood flow of the project site, and no potential to impede or redirect flows such that a significant impact would occur. No mitigation is required.

d. *Less Than Significant Impact* – As stated above under issue X(c[iv]) and according to the Federal Emergency Management Agency (FEMA) National Flood Hazard Layer FIRMette Map, the proposed project is located within Zone X (areas of 0.2% annual change flood (500-year flood)(**Figure X-3**). The project site is not located near any large bodies of water, so impacts associated with seiche or tsunami cannot occur. Mudflow typically occurs on hillsides and the proposed project is not located on a hillside or in an area exposed to significant mudflow. With no human occupancy structures proposed, the development of the solar facilities would not risk release of pollutants due to project inundation. Impacts under this issue are considered less than significant. No mitigation is required.

e. *Less Than Significant Impact* – The proposed project is located within the Indio and Mission Creek subbasin of the Coachella Valley Groundwater Basin. The Indio, Mission Creek, and San Gorgonio Pass Subbasins have been designated as medium-priority, and the Desert Hot Springs Subbasin has been designated as very low-priority, by the DWR.[9] The Sustainable Groundwater Management Act (SMGA) "requires governments and water agencies of high and medium priority basins to halt overdraft and bring groundwater basins into balanced levels of pumping and recharge. Under SGMA, these basins should reach sustainability within 20 years of implementing their sustainability plans. For critically over-drafted basins, that will be 2040. For the remaining high and medium priority basins, 2042 is the deadline."[10] The Coachella Valley Water District (CVWD) has been designated an "exclusive" Groundwater Sustainability Agency (GSA) over its service area by the California Department of Water Resources (DWR) in the Indio Subbasin. Desert Water Agency (DWA), Coachella Water Authority (CWA), and Indio Water Authority (IWA), were also designated GSAs in the Indio Subbasin over their respective service areas. The four agencies are working collaboratively to implement the Sustainable Groundwater Management Act (SGMA) in the Indio Subbasin. The Indio Subbasin GSAs prepared the 2022 Indio Subbasin Water Management Plan Update (2022 Alternative Plan Update). The GSAs adopted the 2022 Alternative Plan Update following a public hearing on December 7, 2021 and submitted it to DWR on December 29, 2021.

The three water agencies located within the Mission Creek Subbasin have formed the Management Committee. CVWD and DWA are each exclusive GSAs that oversee and manage portions of the Mission Creek Subbasin that overlay each of their respective service areas. These agencies coordinate with MSWD, a managing partner, to develop the Mission Creek Subbasin Alternative Plan Update.[11] The Alternative Plan was approved by the California Department of Water Resources (DWR) on July 17, 2019. With this approval, DWR made several recommendations for new information and a requirement that the first Alternative Plan Update be prepared by January 1, 2022. The mission statement of the Alternative Plan is: *"The purpose of the Mission Creek and Garnet Hill Water Management Plan is to manage the water resources to meet demands reliably and protect water quality in a sustainable and cost-effective manner."* As the project proponent (MSWD) is a managing partner of the Mission Creek Subbasin Alternative Plan and subsequent updates thereof, and as the proposed project would not demand substantial water resources, nor water resources

[9] CVWD, 2025. Sustainable Groundwater Management Act. https://www.cvwd.org/357/Sustainable-Groundwater-Management-Act (Accessed 07/15/25)
[10] California Department of Water Resources, 2025. Sustainable Groundwater Management Act (SGMA). https://water.ca.gov/Programs/Groundwater-Management/SGMA-Groundwater-Management (Accessed 07/15/25)
[11] Mission Creek Subbasin SGMA, 2025. Management Committee. http://www.missioncreeksubbasinsgma.org/#Management-Committee (Accessed 07/15/25)

beyond the District's supply and demand into the future, it is not anticipated that the project would obstruct groundwater recharge efforts within or surrounding the project area, no conflict or obstruction of a water quality control plan or sustainable groundwater management plan is anticipated. Thus, it is anticipated that the proposed project would have a less than significant potential to conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

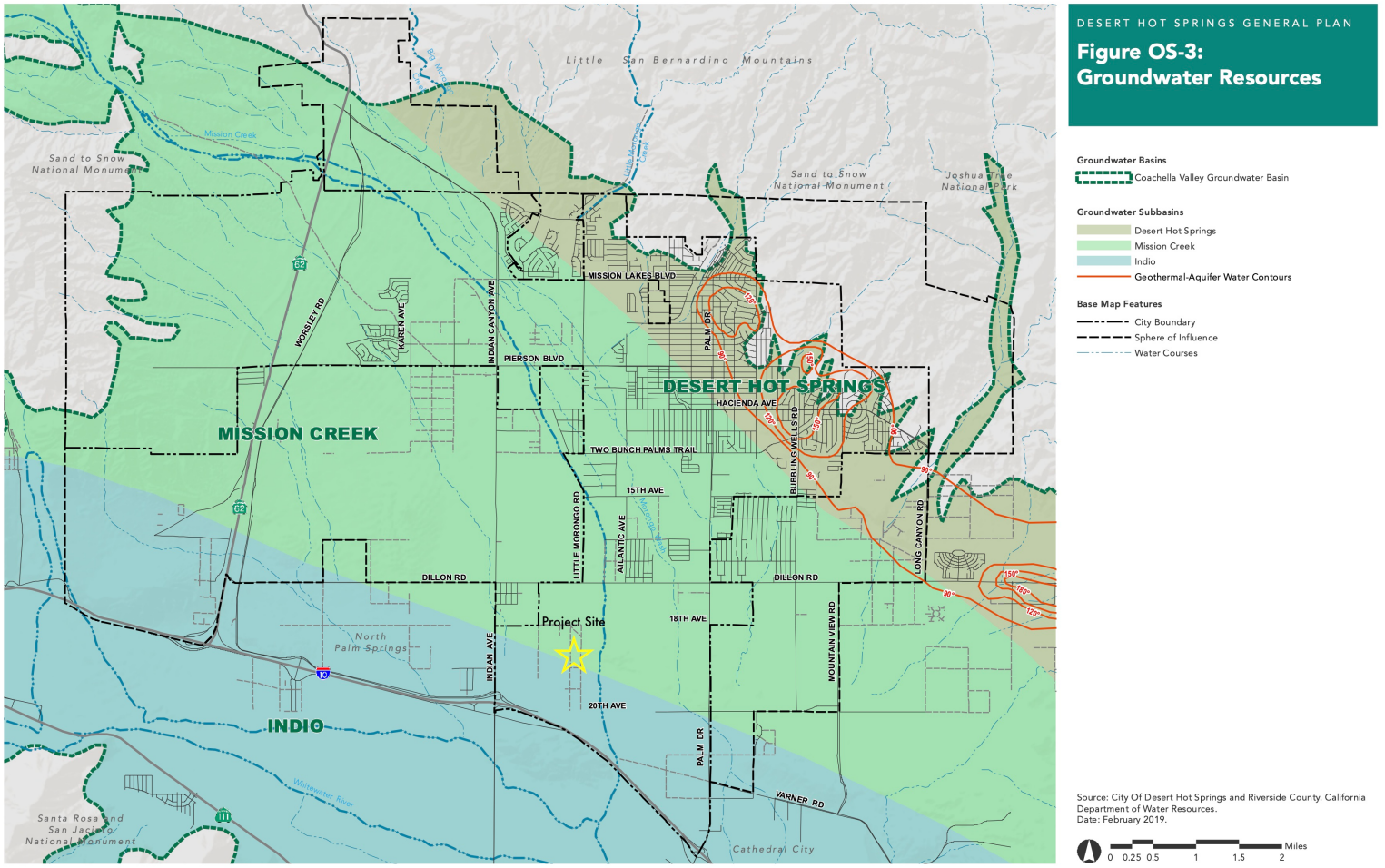

FIGURE X-1

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Groundwater Resources Map

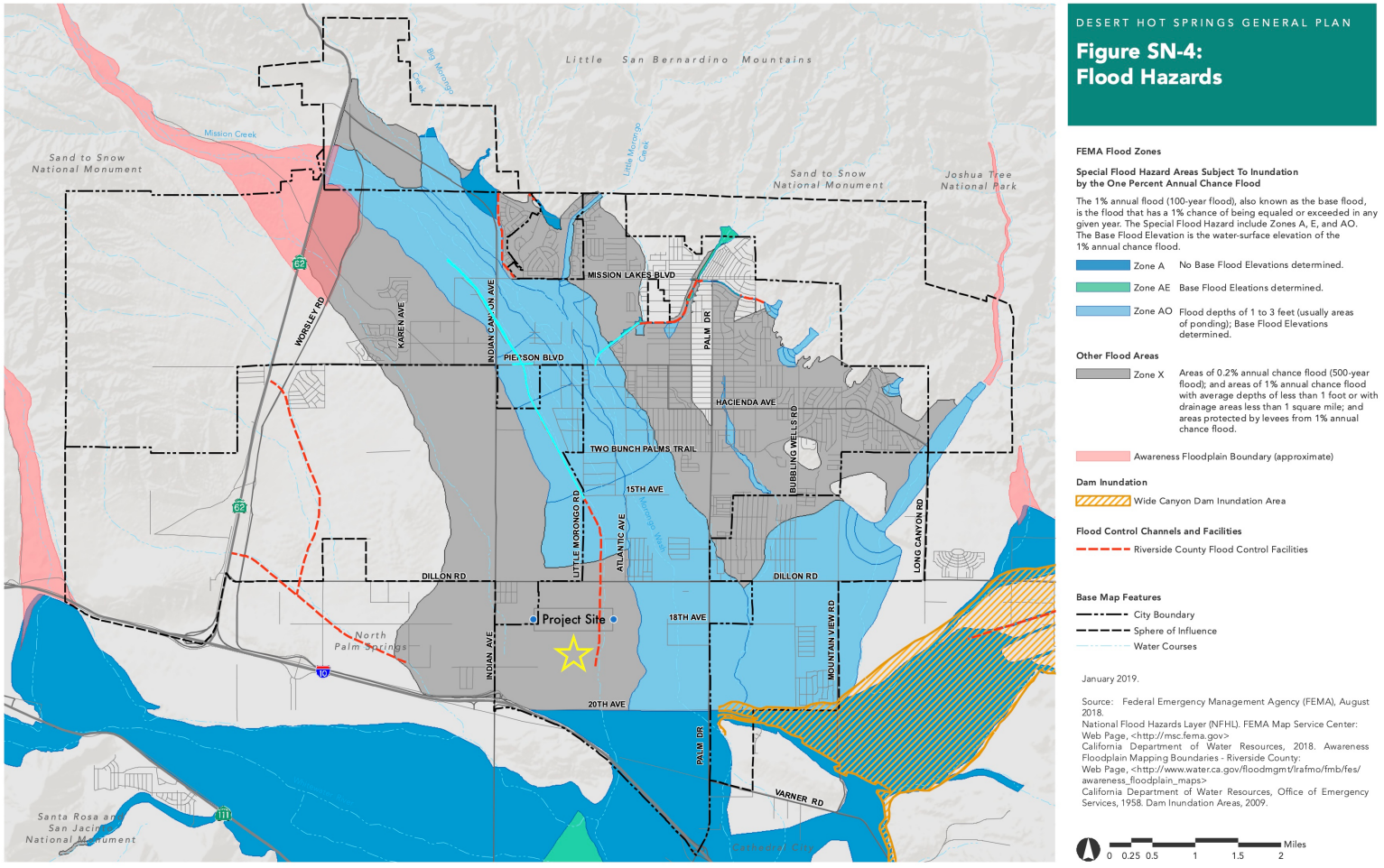

FIGURE X-2

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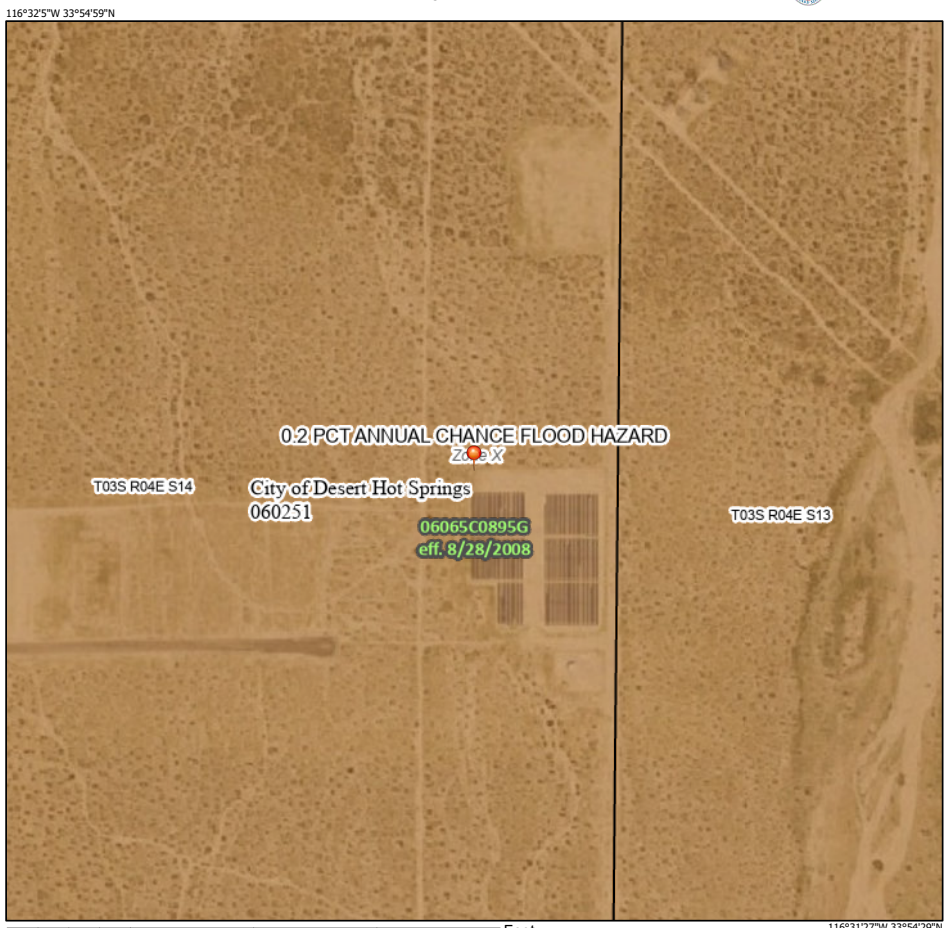
Environmental Consultants

Flood Hazards

National Flood Hazard Layer FIRMette



Basemap Imagery Source: USGS National Map 2023

Legend

SEE FIS REPORT FOR DETAILED LEGEND AND INDEX MAP FOR FIRM PANEL LAYOUT

- **SPECIAL FLOOD HAZARD AREAS**
  - Without Base Flood Elevation (BFE) *Zone A, V, A99*
  - With BFE or Depth *Zone AE, AO, AH, VE, AR*
  - Regulatory Floodway
- **OTHER AREAS OF FLOOD HAZARD**
  - 0.2% Annual Chance Flood Hazard, Areas of 1% annual chance flood with average depth less than one foot or with drainage areas of less than one square mile *Zone X*
  - Future Conditions 1% Annual Chance Flood Hazard *Zone X*
  - Area with Reduced Flood Risk due to Levee. See Notes. *Zone X*
  - Area with Flood Risk due to Levee *Zone D*
- **OTHER AREAS**
  - NO SCREEN Area of Minimal Flood Hazard *Zone X*
  - Effective LOMRs
  - Area of Undetermined Flood Hazard *Zone D*
- **GENERAL STRUCTURES**
  - Channel, Culvert, or Storm Sewer
  - Levee, Dike, or Floodwall
- **OTHER FEATURES**
  - 20.2 Cross Sections with 1% Annual Chance
  - 17.5 Water Surface Elevation
  - Coastal Transect
  - 513 Base Flood Elevation Line (BFE)
  - Limit of Study
  - Jurisdiction Boundary
  - Coastal Transect Baseline
  - Profile Baseline
  - Hydrographic Feature
- **MAP PANELS**
  - Digital Data Available
  - No Digital Data Available
  - Unmapped

N

The pin displayed on the map is an approximate point selected by the user and does not represent an authoritative property location.

This map complies with FEMA's standards for the use of digital flood maps if it is not void as described below. The basemap shown complies with FEMA's basemap accuracy standards

The flood hazard information is derived directly from the authoritative NFHL web services provided by FEMA. This map was exported on 7/22/2025 at 3:41 PM and does not reflect changes or amendments subsequent to this date and time. The NFHL and effective information may change or become superseded by new data over time.

This map image is void if the one or more of the following map elements do not appear: basemap imagery, flood zone labels, legend, scale bar, map creation date, community identifiers, FIRM panel number, and FIRM effective date. Map images for unmapped and unmodernized areas cannot be used for regulatory purposes.

FIGURE X-3

Tom Dodson & Associates
Environmental Consultants

FEMA Flood Map

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
XI. LAND USE AND PLANNING: Would the project:				
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?	☐	☐	☐	☒

SUBSTANTIATION

Impact Analysis

a. *No Impact* – The proposed project will install solar panels and fencing at two separate locations located to the north and west of MSWD's existing solar development at the northwest corner of 18th Avenue and Little Morongo Road, which covers a total of 10.175 acres of land. The surrounding land uses of the project site are industrial and open space, see Table XI-1 below, while the proposed project itself is designated as Industrial (Industrial Cannabis Overlay). The project is located within a land use designation that is appropriate for the proposed Solar Development Project. Given that the proposed new solar development would be developed adjacent to a site already containing an existing solar development, the project would have no potential to physically divide an established community. No mitigation measures are required to address potential impact issues under this impact category.

b. *No Impact* – Please refer to the discussion under issue XI(a) above. The proposed project will occur within two vacant sites containing native vegetation characteristic of the Coachella Valley desert, and will be consistent with the City of Desert Hot Springs General Plan and regulations thereof. Refer to land use designations of the surrounding area demonstrated in Table XI-1, below.

Table XI-1: Surrounding Land Uses

Location	Existing Land Use	Land Use Category	Zoning Classification
North	Vacant	Industrial (I)(Cannabis Overlay)	Industrial Light (I-L)
South	Nancy Wright RWRF	Industrial (I)(Cannabis Overlay)	Industrial Light (I-L)
East	Vacant / Mission Creek	Open Space (OS)	OS-C: Open Space Conservation
West	Vacant	Industrial (I)(Cannabis Overlay)	Industrial Light (I-L)

Furthermore, the City of Desert Hot Springs Municipal Code and Zoning Code therein indicates that the proposed project is an allowed use within the zoning classification and land use designation within which the proposed Solar Development Project would be installed. Thus, the development of the proposed project within the proposed site will be compatible with existing land uses and land use plan, and no conflict or impact thereof has been identified. No mitigation is required.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
XII. MINERAL RESOURCES: Would the project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒
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?	☐	☐	☐	☒

SUBSTANTIATION

Impact Analysis

a&b. *No Impact* – The proposed Solar Development Project is located within the City of Desert Hot Springs. At present, the sites within which the solar will be installed are vacant, with MSWD's existing solar plant located to the south of the RES-BCT solar site, and east of the Nancy Wright RWRF site. According to the Mineral Resources map prepared for the City of Desert Hot Springs General Plan (**Figure XII-1**), no known mines or mineral resources are known to occur on or in the vicinity of the project footprint. As no current mining operations exist within or adjacent to the proposed Solar Development Project footprint, and as none have been identified by the City, implementation of the proposed project will not result in in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state or a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan. No impacts are anticipated under this issue and no mitigation is required.

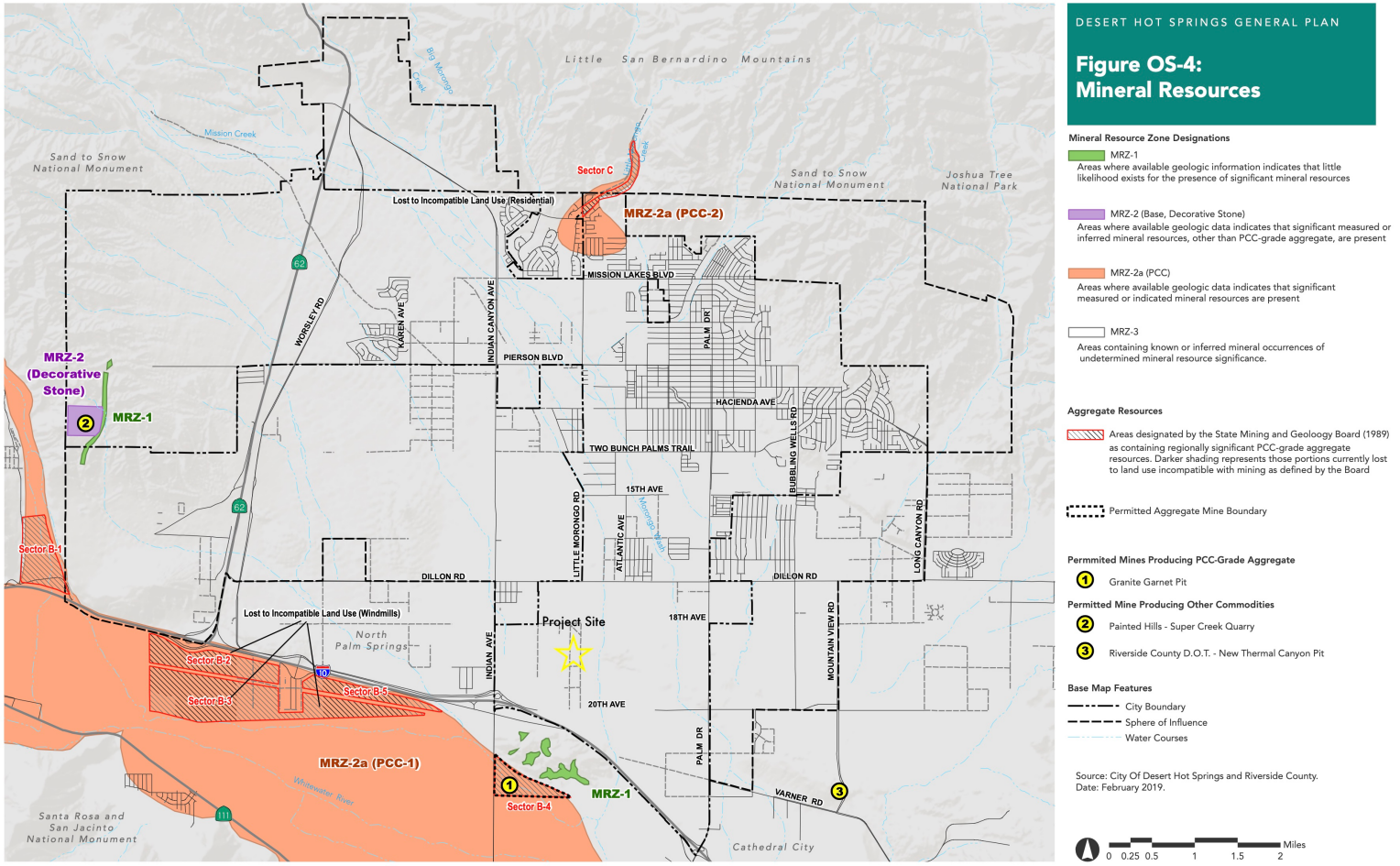


FIGURE XII-1

Tom Dodson & Associates
Environmental Consultant

Mineral Resource Zones Map

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
XIII. NOISE: Would the project result in:				
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of a 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?	☐	☐	☐	☒

SUBSTANTIATION

Background

Noise is generally described as unwanted sound. The proposed project would install ground mounted solar facilities at to the north and west of the existing solar facility located at the northwest intersection of 19th Avenue and Little Morongo Road. The project includes the installation of transmission lines associated with the proposed solar development. No habitable structures are features of the project. The project footprint is located in an area that experiences low traffic volume and is not surrounded by highly noise intensive uses, and as a result the project sites are located in a low-background noise environment.

The unit of sound pressure ratio to the faintest sound detectable to a person with normal hearing is called a decibel (dB). Sound or noise can vary in intensity by over one million times within the range of human hearing. A logarithmic loudness scale, similar to the Richter scale for earthquake magnitude, is therefore used to keep sound intensity numbers at a convenient and manageable level. The human ear is not equally sensitive to all sound frequencies within the entire spectrum. Noise levels at maximum human sensitivity from around 500 to 2,000 cycles per second are factored more heavily into sound descriptions in a process called "A-weighting," written as "dBA."

Leq is a time-averaged sound level; a single-number value that expresses the time-varying sound level for the specified period as though it were a constant sound level with the same total sound energy as the time-varying level. Its unit is the decibel (dB). The most common averaging period for Leq is hourly.

Because community receptors are more sensitive to unwanted noise intrusion during more sensitive evening and nighttime hours, state law requires that an artificial dBA increment be added to quiet time noise levels. The State of California has established guidelines for acceptable community noise levels that are based on the Community Noise Equivalent Level (CNEL) rating scale (a 24-hour integrated noise

measurement scale). The guidelines rank noise land use compatibility in terms of "normally acceptable," "conditionally acceptable," and "clearly unacceptable" noise levels for various land use types. The State Guidelines, Land Use Compatibility for Community Noise Exposure, single-family homes are "normally acceptable" in exterior noise environments up to 60 dB CNEL and "conditionally acceptable" up to 70 dB CNEL based on this scale. Multiple family residential uses are "normally acceptable" up to 65 dB CNEL and "conditionally acceptable" up to 70 CNEL. Schools, libraries and churches are "normally acceptable" up to 70 dB CNEL, as are office buildings and business, commercial and professional uses with some structural noise attenuation.

City of Desert Hot Springs Noise Regulations and Standards

The City of Desert Hot Springs noise standards are found in Section 17-040.180 of the Municipal Code which states:

- In residential areas, no exterior noise level shall exceed 65 dBA and no interior noise level shall exceed 45 dBA.

Construction noise is exempt from these standards as long as work is limited to the hours of 7 am to 5 pm Monday through Saturday. During daylight savings time the permissible hours are 6 am to 6 pm. Construction is not permitted on Sundays.

Impact Analysis

a. *Less Than Significant With Mitigation Incorporated* – The proposed project will install ground mounted solar facilities on two vacant lots. There are no sensitive receptors located adjacent to the sites. As previously stated, the project footprint is located in an area that experiences a low traffic volume and is not surrounded by noise sensitive uses, and as a result is in a low-background noise environment. Once installed the solar array is installed, the noise environment is anticipated to remain consistent with that which exists at present because solar facilities do not generate substantial noise beyond a minimal electrical hum emanating from transformers and other associated electrical appurtenances.

Short Term Construction Noise

Short-term construction noise impacts associated with the proposed project will occur over a period of approximately 105 days, but as the proposed project is located in an area removed from residential uses, there are no sensitive land uses within about 3,500 feet of the project footprint. Construction activities will include noise generated by movement of construction materials to and from the site, trenching and installation of an underground transmission line, and installation of the solar panels. The noise of each of these construction activities varies depending on the type of construction equipment and the location within the footprint within which the construction takes place. The earth-trenching sources are the noisiest type of equipment typically ranging from 82 to 85 dB at 50 feet from the source. Given the great distance between the construction noise sources and nearby sensitive land uses, it is not anticipated that the proposed project would result in noise in excess of the City's noise standards during construction as construction noise would attenuate to an acceptable level. Further, temporary construction noise is exempt from the City's noise standards as long as work is limited to the hours of 7 am to 5 pm Monday through Saturday. The proposed project would be constructed in compliance with the City's noise standards, and construction of the project

would be less than significant. However, to minimize the noise generated on the site to the extent feasible, the following mitigation measures shall be implemented:

NOI-1 ***All construction vehicles and fixed or mobile equipment shall be equipped with operating and maintained mufflers.***

NOI-2 ***All employees that will be exposed to noise levels greater than 75 dB over an 8-hour period shall be provided adequate hearing protection devices to ensure no hearing damage will result from construction activities.***

NOI-3 ***No construction activities shall occur during the hours of 5 PM through 7 AM, Monday through Saturday; at no time shall construction activities occur on Sundays or holidays, unless a declared emergency exists.***

NOI-4 ***Equipment not in use for five minutes shall be shut off.***

NOI-5 ***Equipment shall be maintained and operated such that loads are secured from rattling or banging.***

NOI-6 ***Construction employees shall be trained in the proper operation and use of equipment consistent with these mitigation measures, including no unnecessary revving of equipment.***

NOI-7 ***MSWD will require that all construction equipment be operated with mandated noise control equipment (mufflers or silencers). Enforcement will be accomplished by random field inspections by MSWD.***

NOI-8 ***Construction staging areas shall be located as far from adjacent sensitive receptor locations as possible.***

Long-Term Operational Noise

The proposed project will not cause any measurable permanent increase in ambient noise levels in the vicinity of the project above levels existing without the project, due to the fact that solar panels require minimal noise generating activities in support of their operation. Occasional visits may be required for maintenance and, as previously stated, once installed the solar array is installed, the noise environment is anticipated to remain consistent with that which exists at present because solar facilities do not generate substantial noise beyond a minimal electrical hum emanating from transformers and other associated electrical appurtenances. Therefore, through the implementation of the mitigation measures identified above, neither operation or construction of the proposed project would violate noise standards outlined in the City's Municipal Code. Impacts under this issue are considered less than significant with mitigation incorporated.

b. *Less Than Significant Impact* – Vibration is the periodic oscillation of a medium or object. The rumbling sound caused by vibration of room surfaces is called structure borne noises. Sources of groundborne vibrations include natural phenomena (e.g., earthquakes, volcanic eruptions, sea waves, landslides) or human-made causes (e.g., explosions, machinery, traffic, trains, construction

equipment). Vibration sources may be continuous or transient. Vibration is often described in units of velocity (inches per second), and discussed in vibration decibel (VdB) units in order to compress the range of numbers required to describe vibration. Vibration impacts related to human development are generally associated with activities such as train operations, construction, and heavy truck movements.

The Federal Transportation Administration (FTA) Assessment states that in contrast to airborne noise, ground-borne vibration is not a common environmental problem. Although the motion of the ground may be noticeable to people outside structures, without the effects associated with the shaking of a structure, the motion does not provoke the same adverse human reaction to people outside. Within structures, the effects of ground-borne vibration include noticeable movement of the building floors, rattling of windows, shaking of items on shelves or hanging on walls, and rumbling sounds. FTA Assessment further states that it is unusual for vibration from sources such as buses and trucks to be perceptible, even in locations close to major roads. However, some common sources of vibration are trains, trucks on rough roads, and construction activities, such as blasting, pile driving, and heavy earth-moving equipment. The FTA guidelines identify a level of 80 VdB for sensitive land uses. This threshold provides a basis for determining the relative significance of potential project related vibration impacts. This threshold provides a basis for determining the relative significance of potential project related vibration impacts.

In the short term, it is possible that groundbreaking construction equipment and other equipment required to construct the whole of the project may have some potential to create some vibration at the nearest property line, but there are no sensitive receptors within 3,500 feet of the project footprint, and further there are no historic buildings within the project footprint that would be impacted by construction related vibration. Groundborne vibration is normally perceptible to humans at approximately 65 VdB, while 75 VdB is the approximate dividing line between barely perceptible and distinctly perceptible. Construction activity can result in varying degrees of groundborne vibration, but as there are no sensitive receptors within a sufficient distance from the project to experience groundborne vibration, the project would comply with the City of Desert Hot Springs Municipal Code, and would not result in vibration impacts within the project area. Therefore, impacts from project related vibration would be considered less than significant. No mitigation is required.

c. *No Impact* – According to the City of Desert Hot Springs General Plan, aircraft noise impacting the community emanates from commercial and general aviation operations at the Palm Springs International Airport, located approximately 4 miles south of the proposed project. The Palm Springs International Airport: Airport Master Plan and Part 150 Noise Compatibility Study indicate that flight tracks and patterns that aircraft are assumed to follow outlined in the Airport Noise Study demonstrate limited over flights in Desert Hot Springs. Ultimately, the Airport Master Plan concluded that existing and future noise levels associated with Airport operations will have no significant impact on the City of Desert Hot Springs or its sphere of influence. Given that the proposed solar facilities are located within the City of Desert Hot Springs, it is not anticipated that persons working in the project area will be exposed to excessive noise levels generated by the nearby Airport. No private airstrips are located in close proximity to the proposed project; therefore, there are no impacts under this issue.

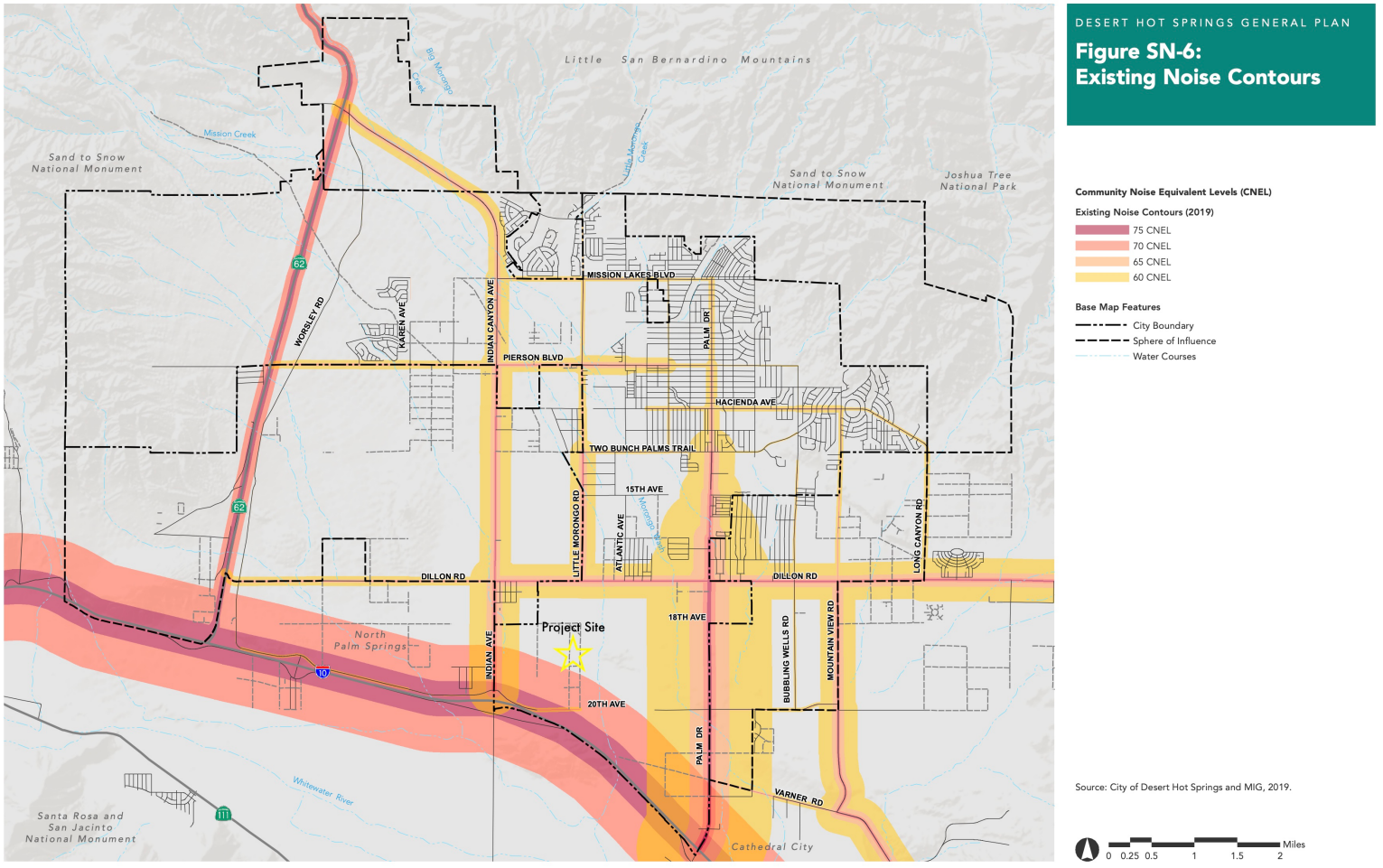


FIGURE XIII-1

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Existing Noise Contours

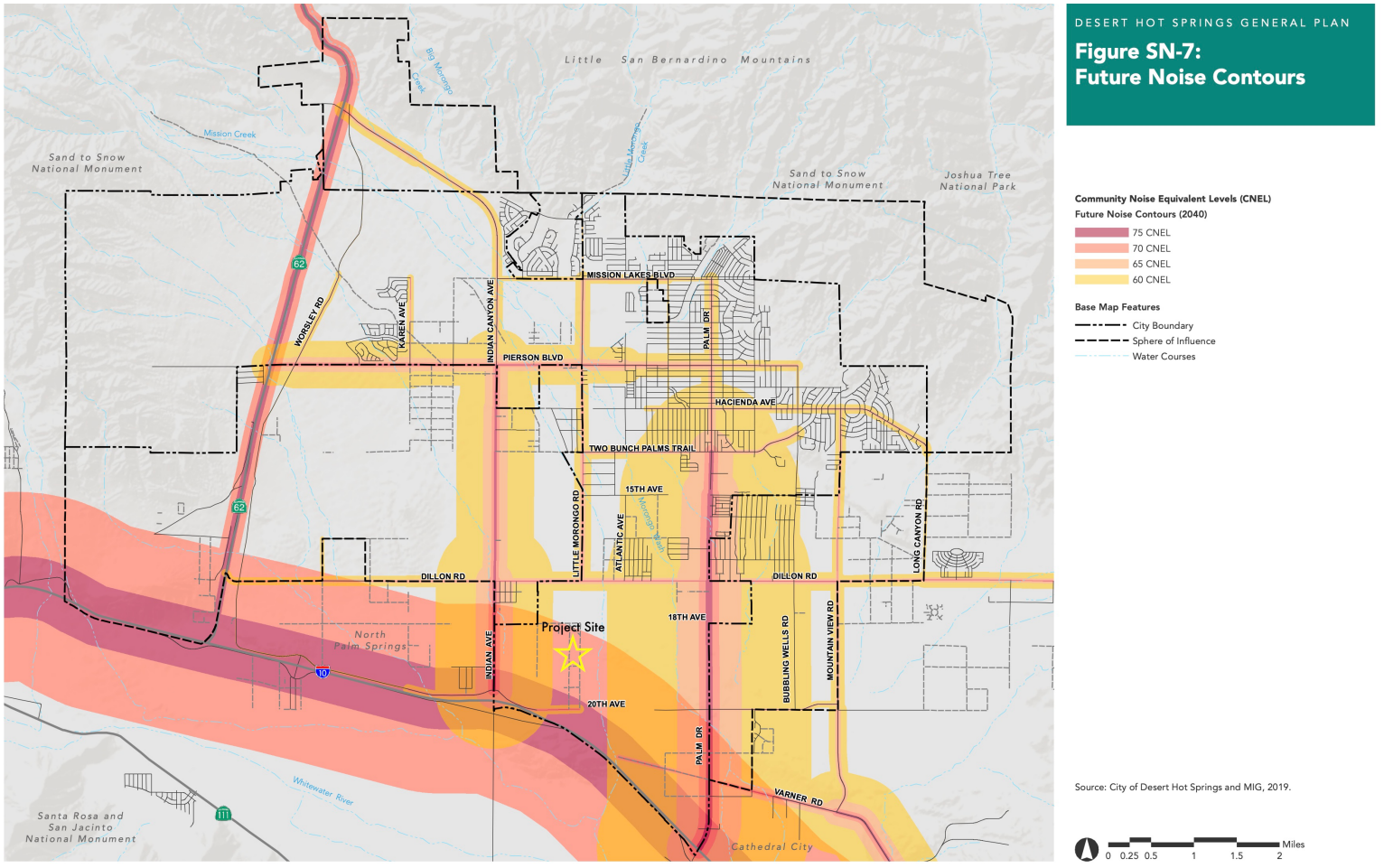

FIGURE XIII-1

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Future Noise Contours Map

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
XIV. POPULATION AND HOUSING: Would the project:				
a) Induce substantial 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?	☐	☐	☐	☒

SUBSTANTIATION

Impact Analysis

a. *Less Than Significant Impact* – Implementation of the project will not induce substantial population growth in the area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure). The proposed project will require a temporary work force; however, this is short-term and with a maximum of about 10 employees will not induce substantial population growth. Furthermore, according to the Southern California Association of Governments (SCAG), the total population of Desert Hot Springs in 2020 was 30,036 persons.[12] The City General Plan notes that the City's population is anticipated to grow to 88,476 residents by 2040. This indicates that the City plans for population growth in the future. As such, given that no additional employees will be required once the solar arrays have been installed and are fully operational, the proposed project would have a less than significant potential to induce substantial population growth in an area, either directly or indirectly..

b. *No Impact* – Implementation of the project will not displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere. There is no existing housing located within the project sites and no persons reside within the project footprint. Therefore, implementation of the project as a whole will not displace any existing housing or displace a substantial number of people that would necessitate the construction of replacement housing elsewhere. No impacts are anticipated and no mitigation is required.

[12] SCAG, 2021. Local Profiles. https://www.arcgis.com/sharing/rest/content/items/4f32535de7444301aee7be8378f4b7ff/data (Accessed 07/25/25)

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
XV. PUBLIC SERVICES: 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:				
a) Fire protection?	☐	☐	☒	☐
b) Police protection?	☐	☐	☒	☐
c) Schools?	☐	☐	☐	☒
d) Parks?	☐	☐	☐	☒
e) Other public facilities?	☐	☐	☐	☒

SUBSTANTIATION

Impact Analysis

a. *Less Than Significant Impact* – The City of Desert Hot Springs is currently served by the Riverside County Fire Department (RCFD). The RCFD currently has two fire stations: Station #36 and Station #37, which, together, responded to approximately 5,746 calls in FY15.[13] Given that the population has not grown substantially over the last decade,[14] it is reasonable to assume that roughly the same number of calls are responded to on average yearly. These calls included medical emergencies, vegetation and structure fires, vehicle accidents, public assistance and false alarms. Station #37 and #36 are both located in the northern part of the City, located about 4-5 miles north of the project site. MSWD proposes to install ground mounted solar arrays along with transmission line. These proposed solar will be installed directly next to an existing solar facility, located at the northwest intersection of 19th Avenue and Little Morongo Road. The project will not include the use or storage of highly flammable materials. Implementation of the project will result in an incremental increase in regional fire protection demand, primarily for emergency services. The need for fire protection services would exist during both the construction and operational phases of the project. However, as the facility would not be manned once in operation, and as construction related fire and emergency service calls would be sporadic on an as needed basis for the minimal construction employees that would be on site during construction, it is not anticipated that the demand for fire protection and emergency services would result in a new demand that would cause significant

[13] City of Desert Hot Springs General Plan EIR (pg. 4.15-1)
[14] SCAG, 2021. Local Profiles.
https://www.arcgis.com/sharing/rest/content/items/4f32535de7444301aee7be8378f4b7ff/data (Accessed 01/15/25)

environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives. Fire protection services are funded by the City's General Fund. Therefore, any impact to the existing fire protection system is considered random and would therefore be less than significant. No additional mitigation is required.

b. *Less Than Significant Impact* – The proposed project site is located within the southern portion of the City of Desert Hot Springs. The City of Desert Hot Springs Police Department provides the citizens of the Planning Area with police services and protection. According to the City's General Plan EIR, Service is primarily provided from the Police Department Office at 65-950 Pierson Blvd, which is about 4 miles north of the project footprint. Additional personnel are provided at a satellite office at the Police Neighborhood Office at 66140 West Arroyo located in Tedesco Park. Police services are dispatched from the Police Department Office, but the satellite office is centrally located for greater police presence in the neighborhood and efficient response. The project is not anticipated to generate growth within the project area that would create a new demand for police protection because no additional employees will be required once the solar arrays are installed and are fully operational. The construction of the solar arrays will require only a temporary work force. The proposed project will not include the kind of use that would likely attract criminal activity, except for random trespass and theft; however, construction equipment will be stored in such a manner that public will not have access to it, and once in operation, the project will not include any habitable structures. As with fire protection services, police protection services are funded by the City's General Fund. Thus, due to the type of project proposed, no new or expanded police facilities would need to be constructed as a result of the project. Therefore, impacts to police protection resources from implementation of the proposed project are considered less than significant; no mitigation measures are required.

c. *No Impact* – The proposed project is located within the Palm Springs Unified School District. Within the City and SOI, there are five elementary schools, two middle schools, and one high school. As discussed under Chapter XIV, Population and Housing, above, the project would not induce population growth within the City, as it will neither construct housing, nor result in a growth in employment opportunities within the area. Because the project would develop electrical infrastructure facilities that are not commercial, residential, or industrial in nature, the proposed project is not required to pay any fees to offset impacts to school facilities. Thus, the proposed project will not generate an increase in elementary, middle, or high school population. No impacts are anticipated and no mitigation is required.

d. *No Impact* – Because the project would develop electrical infrastructure facilities that are not commercial, residential, or industrial in nature, the proposed project is not required to pay any fees to offset impacts to park facilities. As stated in the preceding sections, the proposed project is not anticipated to create a substantial increase in population because it does require additional MSWD staff to operate the proposed RES-BCT and RWRF Solar Development Project. Implementation of the proposed project will not impact any current or planned park use (refer to **Figure XV-1**), as the project sites are currently vacant. Thus, implementation of the proposed project would not cause a substantial adverse physical impact to any parks within the City. No impacts are anticipated, and no mitigation is required.

e. *No Impact* – Other public facilities include library and general municipal services. The library system in the City of Desert Hot Springs is operated by the Riverside County Library System. Since the project will not directly induce substantial population growth, it is not forecast that the use of such facilities will increase as a result of the proposed project. As a result, the implementation of the project will not 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 public services to include other public facilities. Thus, no impacts are anticipated under this issue and no mitigation is required.

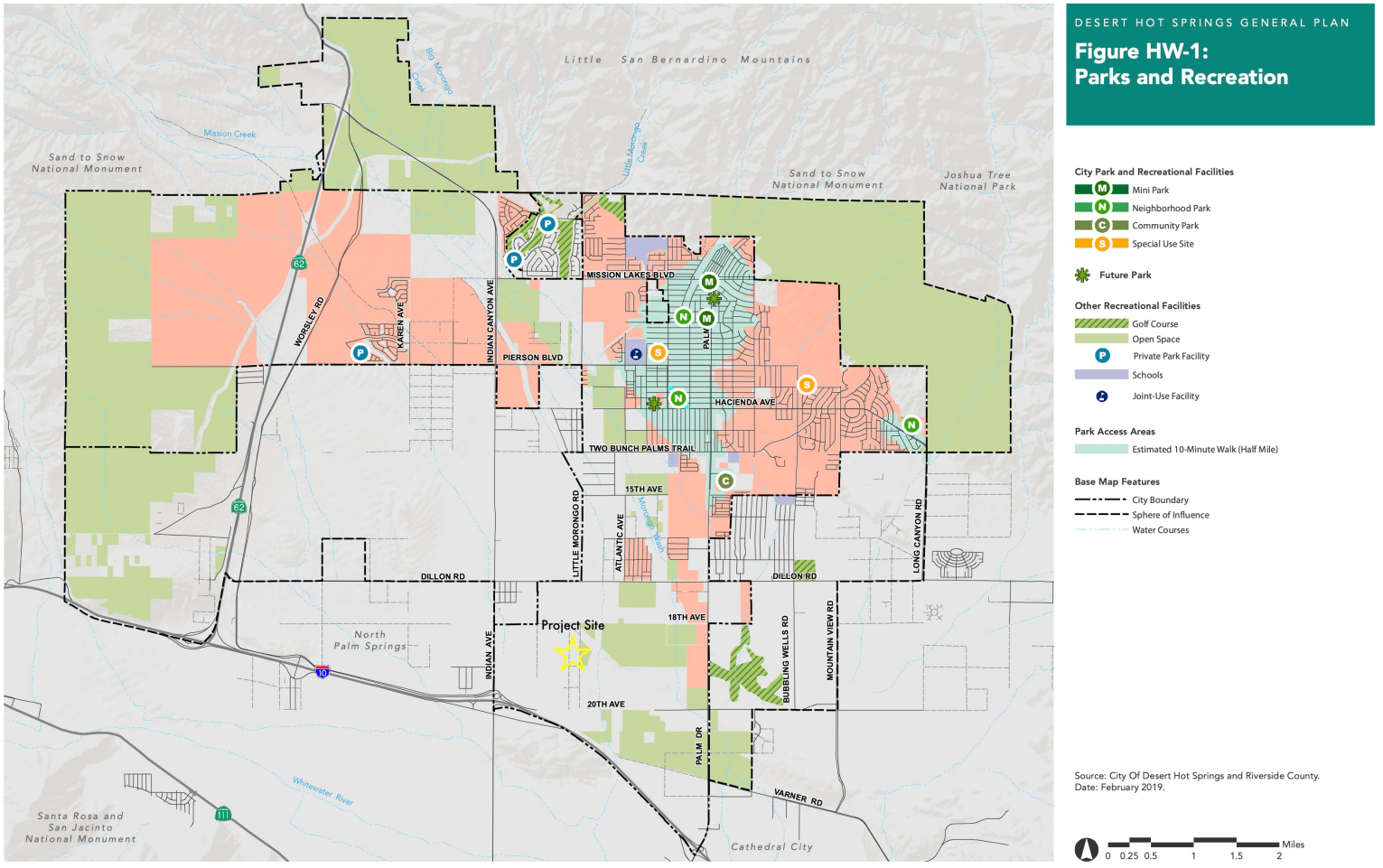

FIGURE XV-1

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Parks and Recreation Map

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
XVI. RECREATION:				
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?	☐	☐	☐	☒

SUBSTANTIATION

Impact Analysis

a. *No Impact* – As previously discussed in Section XIV, Population and Housing and Section XV, Public Services, this project will not contribute to an increase in the population beyond that already allowed or planned for by local and regional planning documents. Therefore, this project will not result in an increase in the demand for parks and other recreational facilities and implementation of the proposed project would not increase the use of any parks within the area, nor would it result in the physical deterioration of other surrounding facilities. No impacts are anticipated. No mitigation is required.

b. *No Impact* – The proposed project does not include recreational facilities, nor does it require the construction or expansion of recreational facilities. The solar facility installation will occur on vacant sites, and does not include the construction or expansion of recreational facilities. Thus, there will be no adverse effects on the recreational facilities from implementing this project. No mitigation is required.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
XVII. TRANSPORTATION: Would the project:				
a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	☐	☒	☐	☐
b) Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	☐	☐	☒	☐
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous inter-sections) or incompatible uses (e.g., farm equipment)?	☐	☒	☐	☐
d) Result in inadequate emergency access?	☐	☒	☐	☐

SUBSTANTIATION

Impact Analysis

a. *Less Than Significant With Mitigation Incorporated* – Preliminary estimates indicate that the proposed project will add an estimated 10-20 new roundtrips per day during construction. During future operations the site will likely be visited about once per month or less depending on the facility's need for maintenance. The addition of 10-20 roundtrips on the local roadways is not forecast to conflict automobile circulation along Little Morongo Road or 19th Avenue. A limited potential to interfere with an emergency response or evacuation plan will occur during construction. At no time during the installation of the proposed solar panels and associated transmission lines will the entirety of either 19th Street or Little Morongo Road be closed. The project would close one lane at a time, which would allow for through-traffic so long as a traffic management plan is developed and implemented; without the implementation of a traffic management plan, impacts could be significant and unavoidable. As such, please refer to the Transportation/Traffic Section of this document, Section XVII. **MM TRAN-1** shall be implemented to address any potential automobile circulation conflicts. Implementation of this measure, in conjunction with the temporary character of the construction impacts, is considered sufficient to ensure adequate flow of traffic in a safe manner during trenching for the transmission lines associated with the proposed project:

TRAN-1 The District shall require that contractors prepare a construction traffic control plan. Elements of the plan should include, but are not necessarily limited to, the following:

- *Develop circulation and detour plans, if necessary, to minimize impacts to local street circulation. Use haul routes minimizing truck traffic on local roadways to the extent possible.*
- *To the extent feasible, and as needed to avoid adverse impacts on traffic flow, schedule truck trips outside of peak morning and evening commute hours.*
- *Install traffic control devices as specified in Caltrans' Manual of Traffic Controls for Construction and Maintenance Work Zones where needed to maintain safe*

driving conditions. Use flaggers and/or signage to safely direct traffic through construction work zones.

- *For roadways requiring lane closures that would result in a single open lane, maintain alternate one-way traffic flow and utilize flagger-controls.*
- *Coordinate with facility owners or administrators of sensitive land uses such as police and fire stations, hospitals, and schools. Provide advance notification to the facility owner or operator of the timing, location, and duration of construction activities.*

Implementation of the project has the potential to conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities. The proposed project will occur within vacant sites located along 19th Street and Little Morongo Road, the latter of which is designated as a Secondary II Street (refer to **Figure XVII-1**). As shown on the Bicycle Plan Map provided as **Figure XVII-2**, the roadways surrounding the proposed project have not been designated as bicycle routes, and as a result, the proposed project would not impact bicycle circulation. As shown on the Pedestrian Plan Map provided as **Figure XVII-3**, the proposed project is not located in an area served by or planned to be served by a pedestrian sidewalk network, and as a result, the proposed project would not impact pedestrian circulation. Finally, the project is not located within an existing or planned transit service route (refer to **Figure XVII-4**), and as a result, the proposed project would not impact transit circulation. Thus, through the implementation of the above mitigation measure requiring a construction traffic management plan, the proposed project would result in a less than significant impact pertaining to the circulation system, particularly given that transit, bicycle, and pedestrian facility circulation will not be disrupted.

b. *Less Than Significant Impact* – The CEQA Guidelines Section 15064.3 identifies the Vehicle Miles Traveled (VMT) as the State's preferred method of evaluating Transportation-related impacts. City of Desert Hot Springs recommends the use of the Riverside County Transportation Analysis Guidelines for Level of Service Vehicle Miles Traveled (County Guidelines). The proposed project will require minimal vehicle miles traveled to accomplish once constructed. In the short term, construction of the proposed facilities will result in the generation of up to about 10-20 roundtrips per day on the adjacent roadways by construction personnel and trucks removing any Construction and Demolition (C&D) materials generated by construction on site. The total number of truck roundtrips per day is estimated to be 3 trips, in addition to an anticipated maximum 10 employee roundtrips per day. The vehicle miles traveled in these instances would likely average less than 80 miles round trip. The number of temporary truck trips will be minimized by using 15 cubic yard material haulers instead of smaller 10 cubic yard trucks to haul material onto and off of the site. Additionally, the same trucks that haul material onto the site would also carry material off of the site. Once constructed, only minimal additional traffic would be generated by this project than that which occurs at present or is otherwise planned to occur as part of area development because other than solar facility maintenance which would occur on a routine basis (approximately once a month), no other operational trips are anticipated. This would therefore result in minimal vehicle miles traveled once the solar facilities are operational. As such, development of the proposed Solar Development Project is not anticipated to result in a significant impact related to vehicle miles travelled, and thus would not conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b). Impacts under this issue are considered less than significant. No mitigation is required.

c. *Less Than Significant With Mitigation Incorporated* – The proposed project does not propose any specific modifications to any roadways. The proposed project will be located within vacant sites surrounding existing solar development within the City of Desert Hot Springs. A limited potential to create a hazard during construction exists as construction of the transmission lines will require trenching within 19th Street and Little Morongo Road. However, at no time during the installation of the proposed solar panels and associated transmission lines will the entirety of either 19th Street or Little Morongo Road be closed. As stated under issue XVII(a) above, with the implementation of **MM TRAN-1**, which requires implementation of a construction traffic management plan, any potential increase in hazards due to design features or incompatible use will be considered less than significant in the short term. In the long term, no impacts to any hazards or incompatible uses in existing roadways are anticipated because the proposed project would enhance the roadway through installing pavement, thereby making the roadway alignment less hazardous through project installation. Thus, any impacts are considered less than significant with implementation of mitigation. No additional mitigation is required.

d. *Less Than Significant With Mitigation Incorporated* – The proposed project will be located within vacant sites surrounding existing solar development within the City of Desert Hot Springs. The proposed Solar Development Project will not be developed adjacent to any identified emergency response or evacuation route that would result in conflicts with emergency access to the site or surrounding area. Access to the Solar Development Project sites would occur along Little Morongo Road and 19th Street (refer to **Figures 2, 4 and 6**). According to the City's General Plan, Interstate-10 is considered an emergency access route. The City has a detailed Emergency Operations Plan, with which the proposed project will have no conflicts. No known emergency access plans or emergency response or evacuation plans will be affected by this project in the short- or long-term. A limited potential to interfere with an emergency response or evacuation plan will occur during construction. At no time during the installation of the proposed solar panels and associated transmission lines will the entirety of either 19th Street or Little Morongo Road be closed. The project would close one lane at a time, which would allow for through-traffic so long as a traffic management plan is developed and implemented; without the implementation of a traffic management plan, impacts could be significant and unavoidable. As such, please refer to the Transportation/Traffic Section of this document, Section XVII. **MM TRAN-1** shall be implemented to address any potential emergency access issues on area roadways. Impacts are reduced to a less than significant level with mitigation incorporated. No additional mitigation is required.

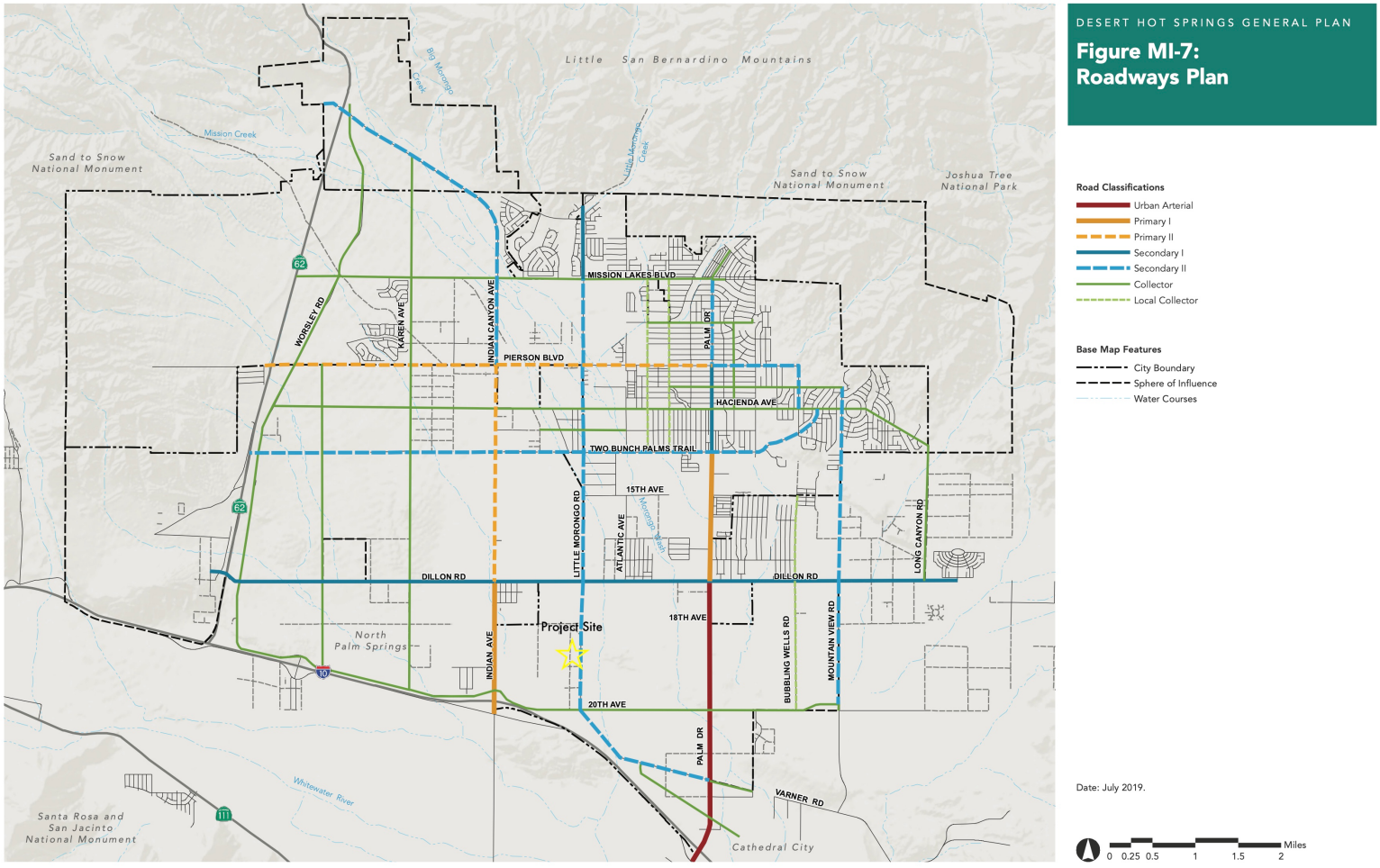

FIGURE XVII-1

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Roadways Plan Map

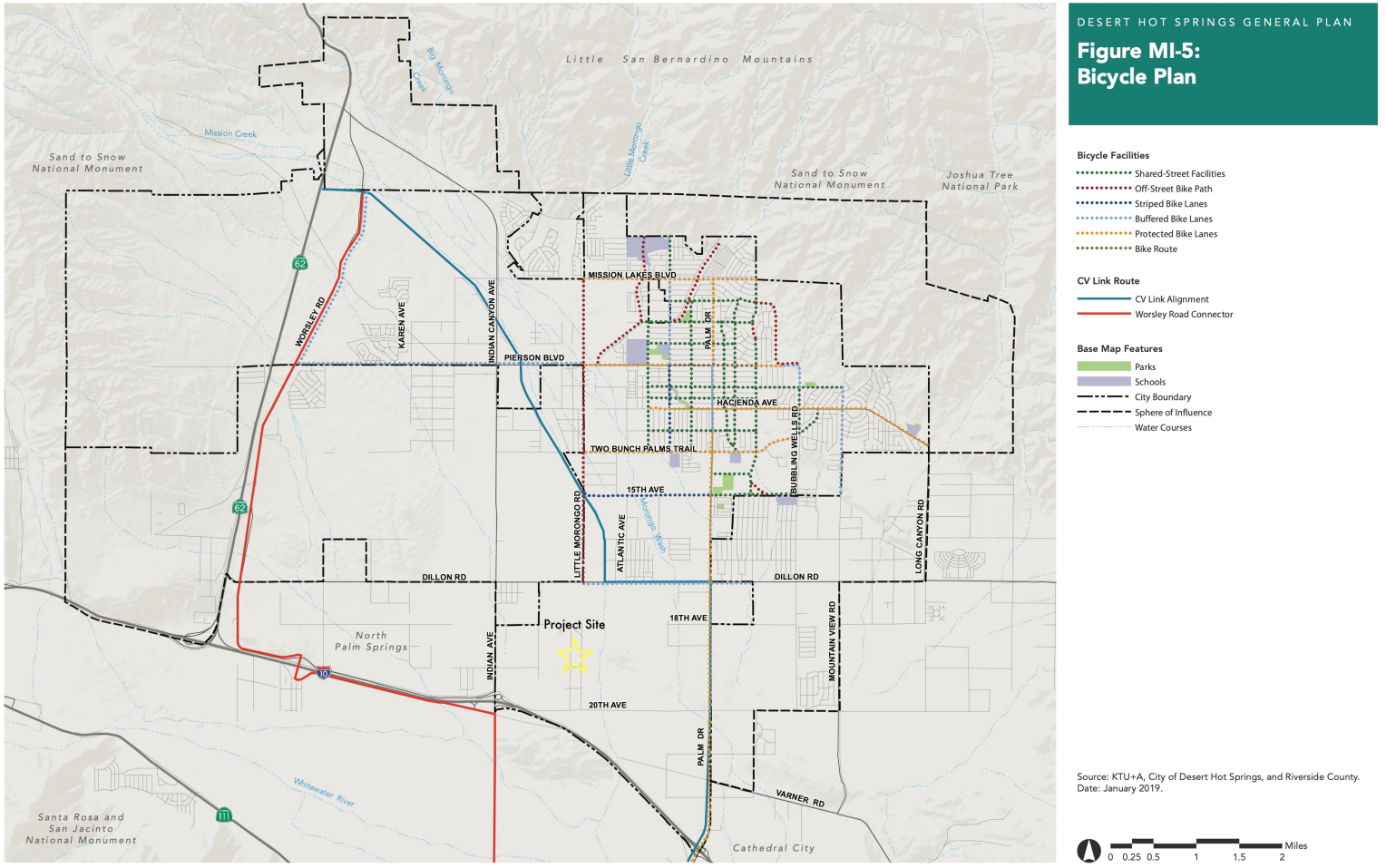

FIGURE XVII-2

Tom Dodson & Associates
Environmental Consultants

Bicycle Plan Map

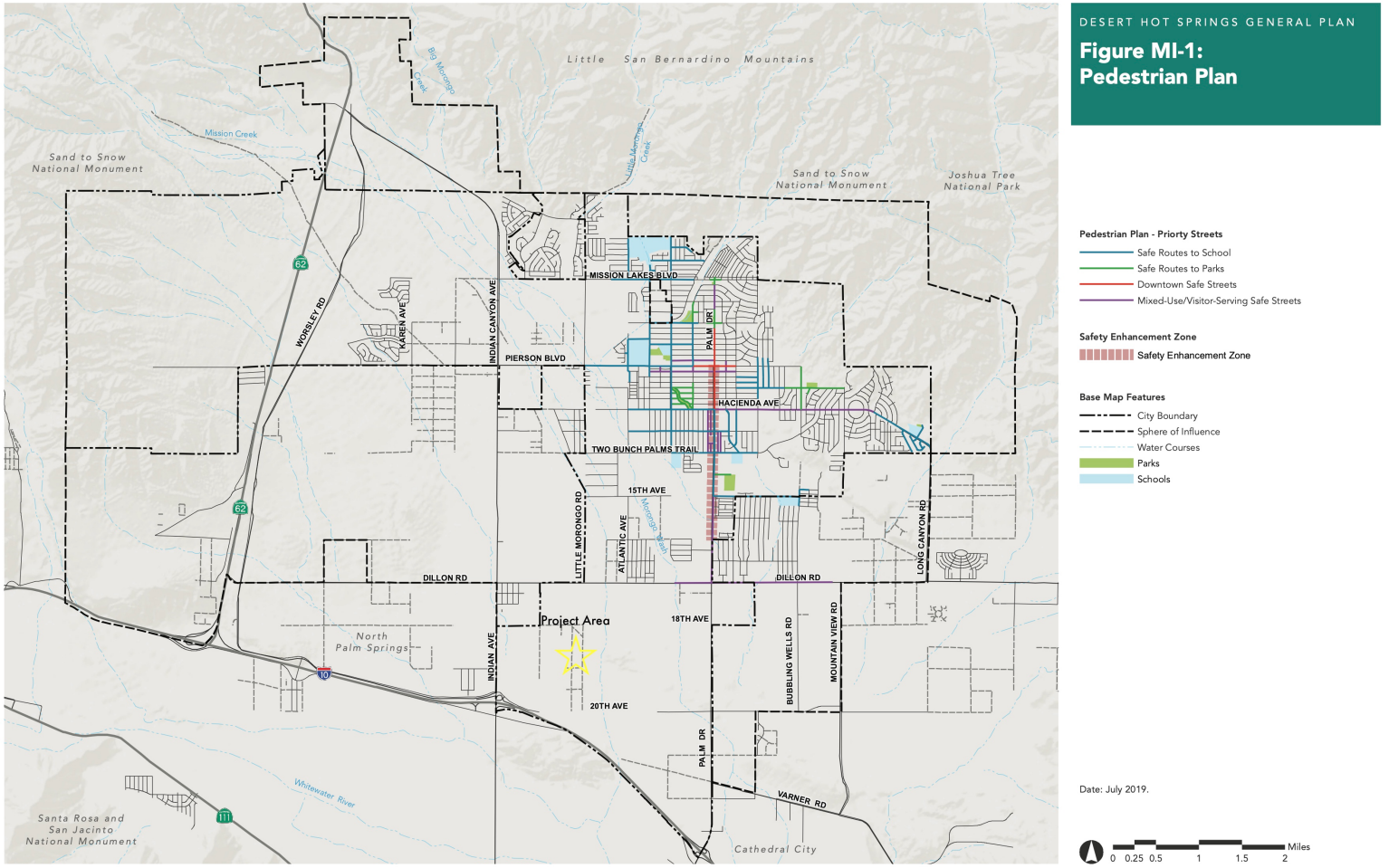

FIGURE XVII-3

Tom Dodson & Associates
Environmental Consultants

Pedestrian Plan Map

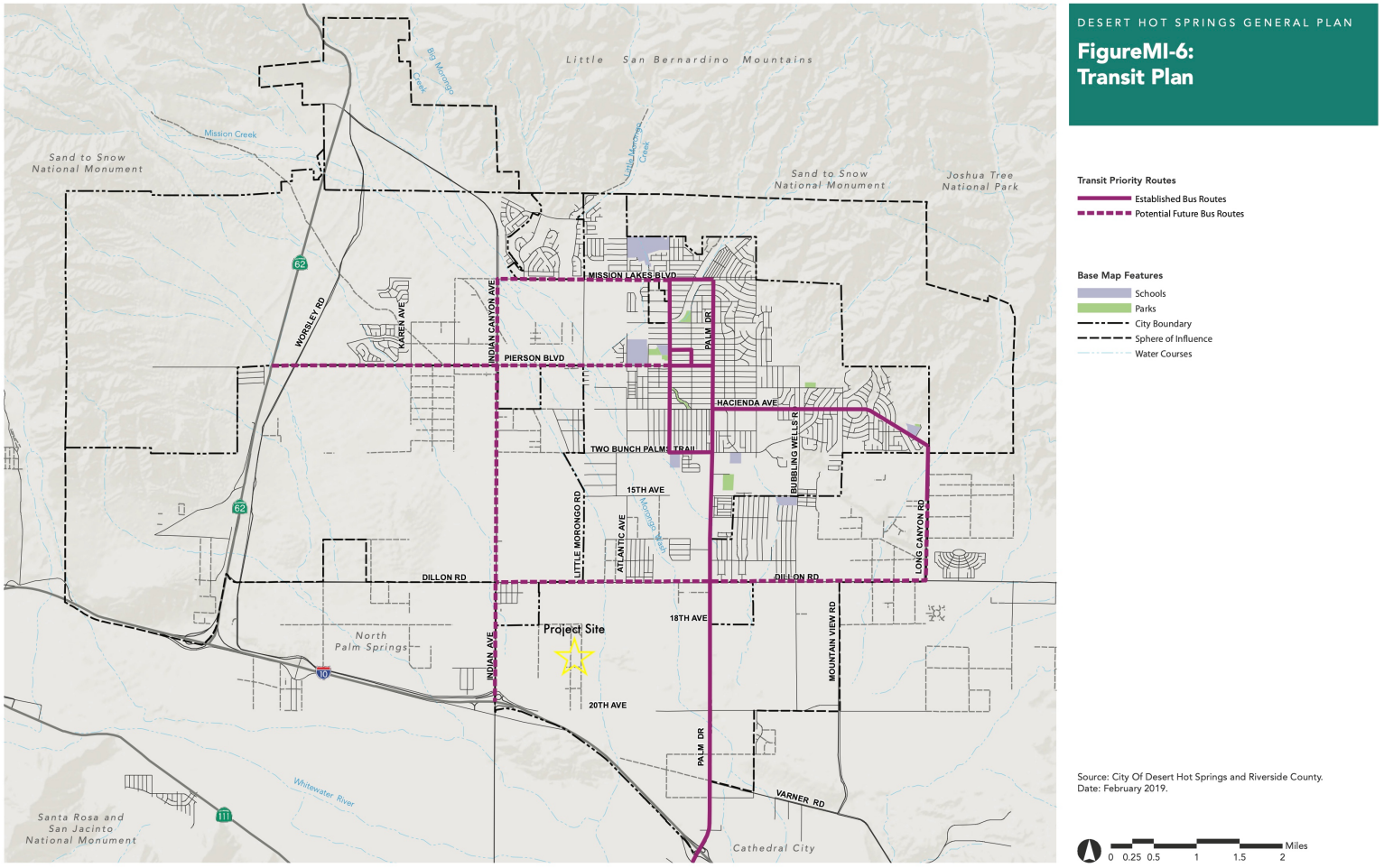

FIGURE XVII-4

Tom Dodson & Associates
Environmental Consultants

Transit Plan Map

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
XVIII. TRIBAL CULTURAL RESOURCES: Would the project cause a substantial change in the significance of tribal cultural resources, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographic-ally defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to the California Native American tribe, and that is:				
a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	☐	☒	☐	☐
b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in sub-division (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.	☐	☒	☐	☐

SUBSTANTIATION: Please refer to the discussion under Section V, Cultural Resources.

Impact Analysis

a&b. *Less Than Significant With Mitigation Incorporated* – Only one tribe has requested consultation with the District under AB 52, the Agua Caliente Band of Cahuilla Indians. AB 52 consultation letters were sent on July 9, 2025. The Tribe responded on July 23, 2025 requesting several items, as well as the following actions to be carried out during ground disturbing activities:

- *Tribal Monitoring during construction as cultural resources have been noted in the surrounding area.*
- *AB-52 Consultation*
- *Final Reports and site records*

Furthermore, during outreach efforts with the ACBCI conducted as part of the Cultural Resources Report effort, the Tribe expressed concerns regarding the sensitivity for Tribal Cultural Resources within the general area and specified that they would request the presence of "an approved Agua Caliente Native American Cultural Monitor(s) during any ground disturbing activities." Thus, the following mitigation measure requiring tribal monitoring during ground disturbing activities is required to ensure that a significant tribal cultural resource impact does not occur:

TCR-1 Prior to carrying out ground disturbing activities, the District shall enter into a Tribal

Monitoring Services Agreement with the Agua Caliente Band of Cahuilla Indians for the project. The Tribal Monitor shall be onsite during all excavation and trenching activities. The Tribal Monitor shall have the authority to temporarily divert, redirect, or halt the excavation activities to allow identification, evaluation, and potential recovery of cultural resources.

As such, through the implementation of **MM TCR-1,** the project has a less than significant potential to cause a substantial change in the significance of tribal cultural resources, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to the California Native American tribe and that is either **a)** Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or **b)** 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. No further mitigation is required.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
XIX. UTILITIES AND SERVICE SYSTEMS: Would the project:				
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment, or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☒	☐
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☐	☒	☐
c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☐	☒
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☒	☐
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☒	☐

SUBSTANTIATION

Impact Analysis

a. Water

No Impact – The proposed project will not develop any housing or human-occupied structures that would require connection to MSWD's water distribution system. The proposed project would install two new solar arrays at the Wright RWRF and RES-BCT sites adjacent to the District's existing solar array at the northwest corner of 19th Avenue and Little Morongo Road. MSWD does not plan on connecting the sites to its water service. The water source for cleaning activities will be from connection to existing nearby fire hydrants or similar MSWD water facilities. Therefore, with no connections to MSWD's water distribution system required, site improvements are not forecast to require or result in the construction of new water facilities or expansion of existing facilities in order to serve the project.

Wastewater

No Impact – The proposed project will not develop any housing or human-occupied structures that would require connection to MSWD's water distribution system. Therefore, with no connections to MSWD's wastewater collection system required, site improvements are not forecast to require or result in the construction of new wastewater facilities or expansion of existing facilities in order to serve the project.

Stormwater

Less Than Significant Impact – As stated under issue XI(c[i-iii]), implementation the proposed project is not forecast to significantly alter the volume of surface/stormwater runoff that will be generated from the project footprint. Given that no new stormwater collection facilities are required to implement the proposed project beyond that which has been incorporated into the design of the project, development of the project will not require or result in the construction of new or expansion of existing stormwater drainage facilities. Thus, impacts under this issue are considered less than significant. No mitigation is required.

Electric Power

Less Than Significant Impact – Development of the solar facilities would, in and of itself, constitute the development of electric power facilities. Solar arrays are alternative energy generating facilities. As such, the proposed Solar Development Project would result in the construction of new/expansion of existing alternative electricity infrastructure to serve MSWD facilities; however, the proposed project would not cause or result in the need for additional electricity producing facilities or electricity delivery systems beyond the proposed solar system described herein. As such, though the project would install alternative electrical generation facilities, that the project is not anticipated to result in a significant impact under any issue,. Therefore, the project would result in a less than significant potential to require or result in the relocation or construction of new or expanded electric power facilities, the construction or relocation of which could cause significant environmental effects.

Natural Gas

No Impact – Development of the solar facilities would not require installation of natural gas, nor any connections thereof. Therefore, the project would not result in a significant environmental effect related to the relocation or construction of new or expanded natural gas facilities. No impacts are anticipated.

Telecommunications

No Impact – Development of the solar facilities would not require installation of wireless internet service or phone service, nor any connections thereof. Therefore, the project would not result in a significant environmental effect related to the relocation or construction of new or expanded telecommunication facilities. No impacts are anticipated.

b. *Less Than Significant Impact* – The project would utilize water from the District's existing supply for onsite dust control. The District's water supply source is 100 percent groundwater produced from District-owned and operated wells. Over the approximately 40 day site preparation and ground disturbance period during construction, the project is expected to use about 5,000 gallons of potable water each day which equates to the installation of the paved roadway requiring up to 200,000 gallons of water (0.61-acre feet) during construction. Additionally, up to 200,000 gallons of

water per year (0.61-acre feet) may be required in support of cleaning the solar panels as part of project operation. This amount is considered nominal when compared to the availability of supply when compared to demand from the project proponent, MSWD, based on a review of the 2020 Coachella Valley Regional Urban Water Management Plan (UWMP).[15] Thus, as discussed in the Hydrology/Water Quality section of this Initial Study, the construction and operation of the proposed Solar Development Project would not cause an adverse effect on the District's water resources. Thus, implementation of the proposed project will have access to sufficient water supplies available to serve the project from existing entitlements and resources, and as a result, impacts would be less than significant. No mitigation is required.

c. *No Impact* – Please refer to the discussion under X(b) and XIX(a) above. The proposed Solar Development Project will not result in any connections to MSWD's wastewater collection system. Therefore, the project would not create a demand of wastewater treatment services that would impact the provider's ability to collect and treat wastewater within their existing commitments. No impacts are anticipated and no mitigation is required.

d&e. *Less Than Significant Impact* – The project will generate construction waste from the removal of vegetation on site where necessary. The inert wastes can be disposed of at existing municipal solid waste facilities, which have adequate capacity to accept inert wastes generated by this project, or can be recycled onsite. Any construction and demolition (C & D) waste, which in this case is generally anticipated to consist of onsite vegetation, will be transferred to the appropriate green waste facility, and any residual materials will be delivered to one of several C & D disposal sites in the area surrounding the project site. Many of these C & D materials can be reused or recycled, thus prolonging our supply of natural resources and potentially saving money in the process.

In accordance with CALGreen code 5.408.4, 100 percent of trees, stumps, rocks and associated vegetation and soils resulting primarily from land clearing must be reused or recycled. As this is a mandatory requirement, no mitigation is required to ensure compliance by MSWD for this project.

Because of increased construction recycling efforts resulting from CalGreen and other regulations, opportunities for construction recycling are becoming easier to find, such as one in Palm Desert that accepts a wide range of construction and demolition debris materials: asphalt, concrete, drywall, gravel, reusable/ deconstructed material, pallets, sand, soil, and wood. There are additional facilities that accept C&D materials located in the surrounding areas[16] including facilities in Coachella, Thousand Palms, Indio, Palm Springs, and Cathedral City that accept a wide range of materials.

The facilities that accept C&D materials, combined with the landfills in the surrounding area, have adequate capacity to serve the proposed project. Solid waste will be disposed of in accordance with existing regulations at an existing licensed landfill. The Lamb Canyon Sanitary Landfill and Badlands Landfill serve the project area. The Lamb Canyon Sanitary Landfill has a maximum permitted daily

[15] Coachella Valley Water District et. Al., 2021. 2020 Coachella Valley Regional Urban Water Management Plan. https://www.cvwd.org/DocumentCenter/View/5482/Coachella-Valley-RUWMP (Accessed 07/21/25)
[16] Riverside County, 2022. Construction Demolition Debris Recyclers https://rcwaste.org/sites/g/files/aldnop376/files/migrated/Portals-0-Files-Planning-CD-DebrisRecyclers.pdf (accessed 07/20/25)

capacity of 5,000 tons per day, with a permitted capacity of 38,935,653 cubic yards (CY), with 19,242,950 CY of capacity remaining.[17] The Badlands landfill has a maximum permitted daily capacity of 5,000 tons per day, with a permitted capacity of 82,300,000 CY, with 7,800,000 CY of capacity remaining.[18] Both landfills permit thousands of tons of waste per day, which is beyond what the expected amount of waste would be generated by the construction of the proposed solar facilities, particularly given that there is no concrete or asphalt that would need to be disposed, as the existing roadway consists of compacted dirt. Furthermore, the proposed project is not anticipated to generate any operational waste as the proposed solar facilities would not generate operational use. As such, the proposed project would comply with all federal, State, and local statues related to solid waste disposal.

Any hazardous materials collected within the project footprint during either construction or operation of the project will be transported and disposed of by a permitted and licensed hazardous materials service provider. Therefore, the project is expected to comply with all regulations related to solid waste under federal, state, and local statutes. Therefore, the project is expected to comply with all regulations related to solid waste under federal, state, and local statutes and be served by a landfill(s) with sufficient permitted capacity to accommodate the project's solid waste disposal needs. No mitigation is necessary.

[17] CalRecycle, 2025. SWIS Facility/Site Activity Details Lamb Canyon Sanitary Landfill (33-AA-0007) https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/2246?siteID=2368 (Accessed 07/20/25)
[18] CalRecycle, 2025. SWIS Facility/Site Activity Details Badlands Sanitary Landfill (33-AA-0006) https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/2245?siteID=2367 (Accessed 07/20/25)

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
XX. WILDFIRE: If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
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 wildfire?	☐	☐	☐	☒
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, 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?	☐	☐	☐	☒

SUBSTANTIATION

Impact Analysis

a-d. *No Impact* – The proposed project is not located in or near state responsibility areas or lands classified as very high fire hazard severity zone. The proposed project is located in the southern portion of the City of Desert Hot Springs, where there are no designated fire hazard severity zones (**Figure IX-2**). Solar arrays are not typically susceptible to wildfire hazards and the development of the proposed Solar Development Project will not increase the risk of wildland fires to nearby residences and structures. The proposed project area is within a remote part of the City that is in the process of being developed. Once installed, the proposed solar facilities will not be susceptible to wildfire risk. Therefore, as the proposed project is not located within or adjacent to a very high fire hazard severity zone or within a State Responsibility Zone, no impacts under these wildfire issues are anticipated.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
XXI. MANDATORY FINDINGS OF SIGNIFICANCE:				
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?	☐	☒	☐	☐

SUBSTANTIATION

The analysis in this Initial Study and the findings reached indicate that the proposed project can be implemented without causing any new project specific or cumulatively considerable unavoidable significant adverse environmental impacts. Mitigation is required to control potential environmental impacts of the proposed project to a less than significant impact level. The following findings are based on the detailed analysis of the Initial Study of all environmental topics and the implementation of the mitigation measures identified in the previous text and summarized following this section.

a. *Less Than Significant With Mitigation Incorporated* – The project has no potential to cause a significant impact to any biological or cultural resources as a result of the implementation of mitigation intended to minimize effects thereof. The proposed project has been identified as having no potential to degrade the quality of the natural environment, substantially reduce 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, or reduce the number or restrict the range of a rare or endangered plant or animal. The project requires mitigation to prevent significant impacts to BUOW, loggerhead shrike, and nesting birds from occurring as a result of implementation of the project. Furthermore, the proposed project requires compliance with the CVMSHCP through the implementation of mitigation. Given that the proposed project would not impact any CVMSHCP Conservation Areas, under which the Coachella Valley milk-vetch and Coachella Valley fringe-toed lizard are all CVMSHCP Covered Species and CVMSHCP provides "take" authorization for Covered

Species during otherwise lawful activities, by providing for the conservation of the Covered Species. Based on the historic disturbance of the project footprint, and its current disturbed condition, the potential for impacting cultural resources is low. Based on a records search of the property, as well as a site survey by a qualified archaeologist, it has been determined that no cultural resources of importance are anticipated to occur within the proposed Solar Development Project footprint, so it is not anticipated that any resources could be affected by the project because no cultural resources exist. However, because it is not known what could be unearthed upon any excavation activities, contingency mitigation measures are provided to ensure that, in the unlikely event that any resources are found, they are protected from any potential significant adverse impacts. Please see biological and cultural sections of this Initial Study.

b. *Less Than Significant With Mitigation Incorporated* – Based on the analysis in this Initial Study, the proposed Solar Development Project has the potential to cause impacts that are individually or cumulatively considerable. There are no other projects in the vicinity to which this project would make a cumulatively considerable impact, furthermore the provision of new alternative sources of energy is generally viewed as a benefit to the community. The issues of Biological Resources, Cultural Resources, Geology and Soils, Hazards and Hazardous Materials, Hydrology and Water Quality, Noise, Transportation, and Tribal Cultural Resources require the implementation of mitigation measures to reduce impacts to a less than significant level and ensure that cumulative effects are not cumulatively considerable. All other environmental issues were found to have no significant impacts without implementation of mitigation. The potential cumulative environmental effects of implementing the proposed project have been determined to be less than considerable through the implementation of mitigation and thus, less than significant impacts.

c. *Less Than Significant With Mitigation Incorporated* – The project will achieve long-term community goals by improving the availability of alternative sources of energy within MSWD's service area. As discussed under issue VIII Greenhouse Gas, the actions and outcomes in the 2022 Scoping Plan for Achieving Carbon Neutrality will achieve significant reductions in fossil fuel combustion by deploying clean technologies and fuels, further reductions in short-lived climate pollutants, support for sustainable development, increased action on natural and working lands to reduce emissions and sequester carbon, and the capture and storage of carbon. This project involves the construction of alternative electricity generation facilities through two new solar arrays by MSWD in the City of Desert Hot Springs, and would aid in meeting the provisions of the 2022 Scoping Plan through the deployment of clean technologies and energy sources via the proposed solar development. Further, the project has been designed to align with the goals of the City's CAP. The short-term impacts associated with the project, which are mainly construction-related impacts, are less than significant with mitigation, and the proposed project is compatible with long-term environmental protection. The issues of Geology and Soils, Hazards and Hazardous Materials, and Noise require the implementation of mitigation measures to reduce potential human impacts to a less than significant level. All other environmental issues were found to have no significant impacts on humans without implementation of mitigation. The potential for direct human effects from implementing the proposed project have been determined to be less than significant.

Conclusion

This document evaluated all CEQA issues contained in the Initial Study Checklist form. The evaluation determined that either no impact or less than significant impacts would be associated with the issues of Aesthetics, Agricultural and Forestry Resources, Air Quality, Energy, Greenhouse Gas Emissions, Land Use and Planning, Mineral Resources, Population/Housing, Public Services, Recreation, Utilities and Service Systems and Wildfire. The issues of Biological Resources, Cultural Resources, Geology and Soils, Hazards and Hazardous Materials, Hydrology and Water Quality, Noise, Transportation, and Tribal Cultural Resources and require the implementation of mitigation measures to reduce impacts to a less than significant level. The required mitigation has been proposed in this Initial Study to reduce impacts for these issues to a less than significant impact.

Based on the findings in this Initial Study, the MSWD proposes to adopt a Mitigated Negative Declaration (MND) for the Mission Springs Water District RES-BCT and Regional Water Reclamation Facility Solar Development Project. A Notice of Intent to Adopt a Mitigated Negative Declaration (NOI) will be issued for this project by the MSWD. The Initial Study and NOI will be circulated for 30 days of public comment. At the end of the 30-day review period, a final MND package will be prepared and it will be reviewed by MSWD for possible adoption at a future Board meeting, the date for which has yet to be determined. If you or your agency comments on the MND/NOI for this project, you will be notified about the meeting dates in accordance with the requirements in Section 21092.5 of CEQA (statute).

Note: Authority cited: Sections 21083 and 21083.05, Public Resources Code. Reference: Section 65088.4, Gov. Code; Sections 21080(c), 21080.1, 21080.3, 21083, 21083.05, 21083.3, 21093, 21094, 21095, and 21151, Public Resources Code; *Sundstrom v. County of Mendocino*,(1988) 202 Cal.App.3d 296; *Leonoff v. Monterey Board of Supervisors*, (1990) 222 Cal.App.3d 1337; *Eureka Citizens for Responsible Govt. v. City of Eureka* (2007) 147 Cal.App.4th 357; *Protect the Historic Amador Waterways v. Amador Water Agency* (2004) 116 Cal.App.4th at 1109; San *Franciscans Upholding the Downtown Plan v. City and County of San Francisco* (2002) 102 Cal.App.4th 656.

Revised 2019
Authority: Public Resources Code sections 21083 and 21083.09
Reference: Public Resources Code sections 21073, 21074, 21080.3.1, 21080.3.2, 21082.3/ 21084.2 and 21084.3

SUMMARY OF MITIGATION MEASURES

Biological Resources

BIO-1 Prior to commencement of construction, a protocol burrowing owl survey will be conducted using the 2012 survey protocol methodology identified in the "Staff Report on Burrowing Owl Mitigation, State of California, Natural Resources Agency, Department of Fish and Game, March 7, 2012," or the most recent CDFW survey protocol available. The burrowing owl survey shall be conducted with a minimum of four site visits conducted on four separate days.

BIO-2 A preconstruction presence/absence survey shall be conducted no more 30 days in advance of construction. This survey can overlap with the final protocol burrowing owl survey conducted pursuant to MM BIO-1.

BIO-3 If burrowing owl(s) are detected during the focused surveys within the area of potential effect delineated by the construction contractor in coordination with the biologist, the MSWD shall immediately contact CDFW for coordination of next steps prior to commencing project construction or ground disturbing activities. If a BUOW is found on-site at the time of construction, all activities likely to affect the animal(s) must cease immediately and CDFW shall to be contacted to determine appropriate management actions. All actions thereafter shall be at the discretion and approval of CDFW in compliance with CESA.

BIO-4 Regardless of the time of year, a preconstruction survey shall be performed to verify absence of nesting birds. A qualified biologist shall conduct the pre-activity survey within the project areas (including access routes) and a 500-foot buffer surrounding the project areas, no more than three (3) days prior to the initiation of project activities, including, but not limited to clearing, grubbing, and/or rough grading to prevent impacts to birds and their nests. Pre-construction surveys shall focus on both direct and indirect evidence of nesting, including nest locations and nesting behavior. The qualified biologist shall make every effort to avoid potential nest predation as a result of survey and monitoring efforts. If nesting bird activity is present within the work area or the project's zone of influence (generally 100-300 feet), a no disturbance buffer zone shall be established by the qualified biologist to be marked on the ground around each nest. The buffer shall be a minimum of 500 feet for raptors and 300 feet for songbirds, unless a smaller buffer is specifically determined by a qualified biologist familiar with the nesting phenology of the nesting species. The buffer areas shall be avoided until the nests are no longer occupied and the juvenile birds can survive independently from the nests. Active nest(s) and an established buffer distance(s) shall be monitored daily by the qualified biologist until the qualified biologist has determined the young have fledged or the project has been completed. The qualified biologist has the authority to stop work if nesting pairs exhibit signs of disturbance. If there is no nesting activity, then no further action is needed for this measure. If an active nest is encountered during the project construction, construction shall stop immediately until a qualified biologist can determine (1) the status of the nest, and (2) when work can proceed without risking violation to state or federal laws.

BIO-5 The project shall be required to comply with the provisions of the Coachella Valley Multi-Species

Habitat Conservation Plan requirements for projects adjacent to Conservation Areas.

1) Drainage – Proposed Development adjacent to or within a Conservation Area shall incorporate plans to ensure that the quantity and quality of runoff discharged to the adjacent Conservation Area is not altered in an adverse way when compared with existing conditions. Stormwater systems shall be designed to prevent the release of toxins, chemicals, petroleum products, exotic plant materials or other elements that might degrade or harm biological resources or ecosystem processes within the adjacent Conservation Area.
2) Toxics – Land uses proposed adjacent to or within a Conservation Area that use chemicals or generate byproducts such as manure that are potentially toxic or may adversely affect wildlife and plant species, Habitat, or water quality shall incorporate measures to ensure that application of such chemicals does not result in any discharge to the adjacent Conservation Area.
3) Lighting – For proposed Development adjacent to or within a Conservation Area, lighting shall be shielded and directed toward the developed area. Landscape shielding or other appropriate methods shall be incorporated in project designs to minimize the effects of lighting adjacent to or within the adjacent Conservation Area in accordance with the guidelines to be included in the Implementation Manual.
4) Noise – Proposed Development adjacent to or within a Conservation Area that generates noise in excess of 75 dBA Leq hourly shall incorporate setbacks, berms, or walls, as appropriate, to minimize the effects of noise on the adjacent Conservation Area in accordance with the guidelines to be included in the Implementation Manual.
5) Invasives – Invasive, non-native plant species shall not be incorporated in the landscape for land uses adjacent to or within a Conservation Area. Landscape treatments within or adjacent to a Conservation Area shall incorporate native plant materials to the maximum extent Feasible; recommended native species are listed in Table 4-112 [of the CVMSHCP]. The plants listed in Table 4-113 [of the CVMSHCP] shall not be used within or adjacent to a Conservation Area. This list may be amended from time to time through a Minor Amendment with Wildlife Agency Concurrence.
6) Barriers – Land uses adjacent to or within a Conservation Area shall incorporate barriers in individual project designs to minimize unauthorized public access, domestic animal predation, illegal trespass, or dumping in a Conservation Area. Such barriers may include native landscaping, rocks/boulders, fencing, walls and/or signage.
7) Grading/Land Development – Manufactured slopes associated with site Development shall not extend into adjacent land in a Conservation Area.

Cultural Resources

CUL-1 Should any cultural resources be encountered during construction of these facilities, earthmoving or grading activities in the immediate area of the finds shall be halted and an onsite inspection shall be performed immediately by a qualified archaeologist. Responsibility for making this determination shall be with the District's onsite inspector. The archaeological professional shall assess the find, determine its significance, and make recommendations for appropriate mitigation measures within the guidelines of the California Environmental Quality Act.

Geology and Soils

GEO-1 Stored backfill material shall be covered with water resistant material during periods of heavy precipitation to reduce the potential for rainfall erosion of stored backfill material. Where covering is not possible, measures such as the use of straw bales or sand bags shall be used to capture and hold eroded material on the project site for future cleanup such that erosion does not occur.

GEO-2 Excavated areas shall be backfilled and compacted such that erosion does not occur.

GEO-3 All exposed, disturbed soil (trenches, stored backfill, etc.) will be sprayed with water or soil binders twice a day or more frequently if fugitive dust is observed migrating from the site within which the paved roadway is being installed.

GEO-4 Based upon the geotechnical investigation (Appendices 5a and 5b of this document), all of the recommended design parameters identified in Appendices 5a and 5b shall be implemented by the Developer. Implementation of these specific measures will address all of the identified geotechnical constraints identified at project site, including seismic ground shaking.

GEO-5 Should any paleontological resources be encountered during construction of the project, earthmoving or grading activities in the immediate area of the finds shall be halted and an onsite inspection should be performed immediately by a qualified paleontologist. Responsibility for making this determination shall be with the MSWD's onsite inspector. The paleontological professional shall assess the find, determine its significance, and determine appropriate management measures within the guidelines of the California Environmental Quality Act that shall be implemented to minimize any impacts to a paleontological resource.

Hazards and Hazardous Materials

HAZ-1 All accidental spills or discharge of hazardous material during construction activities shall be reported to the Certified Unified Program Agency and shall be remediated in compliance with applicable state and local regulations regarding cleanup and disposal of the contaminant released. The contaminated waste will be collected and disposed of at an appropriately a licensed disposal or treatment facility. This measure shall be incorporated into the SWPPP prepared for the proposed project. Prior to accepting the site as remediated, the area contaminated shall be tested to verify that any residual concentrations meet the standard for future residential or public use of the site.

Hydrology and Water Quality

HYD-1 MSWD shall require that the construction contractor prepare and implement a Storm Water Pollution Prevention Plan (SWPPP) which specifies Best Management Practices (BMPs) that will prevent all construction pollutants from contacting stormwater and with the intent of keeping all products of erosion from moving offsite into receiving waters. The SWPPP shall include a Spill Prevention and Cleanup Plan that identifies the methods of containing, cleanup, transport and proper disposal of hazardous chemicals or materials released during construction activities that

are compatible with applicable laws and regulations. BMPs to be implemented in the SWPPP may include but not be limited to:

- The use of silt fences;
- The use of temporary stormwater desilting or retention basins;
- The use of water bars to reduce the velocity of stormwater runoff;
- The use of wheel washers on construction equipment leaving the site;
- The washing of silt from public roads at the access point to the site to prevent the tracking of silt and other pollutants from the site onto public roads;
- The storage of excavated material shall be kept to the minimum necessary to efficiently perform the construction activities required. Excavated or stockpiled material shall not be stored in water courses or other areas subject to the flow of surface water; and
- Where feasible, stockpiled material shall be covered with waterproof material during rain events to control erosion of soil from the stockpiles.

HYD-2 Prior to commencement of construction, the District shall be required to either:
(1) Prepare a No Net Discharge Report demonstrating that within each facility surface runoff shall be collected and retained (for use onsite) or detained and percolated into the ground on the site such that site development results in no net increase in offsite stormwater flows. Detainment shall be achieved through Low Impact Development techniques whenever feasible, and shall include techniques that remove the majority of urban storm runoff pollutants, such as petroleum products and sediment. The purpose of this measure is to remove the onsite contribution to cumulative urban storm runoff and ensure the discharge from the sites is treated to reduce contributions of urban pollutants to downstream flows and to groundwater; or, where it is not feasible to eliminate stormwater flows off of a site or where otherwise appropriate, the implementing agency shall:
(2) Prepare a grading and drainage plan that identifies anticipated changes in flow that would occur on site and minimizes any potential increases in discharge, erosion, or sedimentation potential in accordance with applicable regulations and requirements for the County of Riverside. In addition, all new drainage facilities shall be designed in accordance with standards and regulations. The plan shall identify and implement retention basins, BMPs, and other measures to ensure that potential increases in storm water flows and erosion would be minimized, in accordance with local requirements.

Noise

NOI-1 All construction vehicles and fixed or mobile equipment shall be equipped with operating and maintained mufflers.

NOI-2 All employees that will be exposed to noise levels greater than 75 dB over an 8-hour period shall be provided adequate hearing protection devices to ensure no hearing damage will result from construction activities.

NOI-3 No construction activities shall occur during the hours of 5 PM through 7 AM, Monday through Saturday; at no time shall construction activities occur on Sundays or holidays, unless a declared emergency exists.

NOI-4 Equipment not in use for five minutes shall be shut off.

NOI-5 Equipment shall be maintained and operated such that loads are secured from rattling or banging.

NOI-6 Construction employees shall be trained in the proper operation and use of equipment consistent with these mitigation measures, including no unnecessary revving of equipment.

NOI-7 MSWD will require that all construction equipment be operated with mandated noise control equipment (mufflers or silencers). Enforcement will be accomplished by random field inspections by MSWD.

NOI-8 Construction staging areas shall be located as far from adjacent sensitive receptor locations as possible.

Transportation

TRAN-1 The District shall require that contractors prepare a construction traffic control plan. Elements of the plan should include, but are not necessarily limited to, the following:

- Develop circulation and detour plans, if necessary, to minimize impacts to local street circulation. Use haul routes minimizing truck traffic on local roadways to the extent possible.
- To the extent feasible, and as needed to avoid adverse impacts on traffic flow, schedule truck trips outside of peak morning and evening commute hours.
- Install traffic control devices as specified in Caltrans' Manual of Traffic Controls for Construction and Maintenance Work Zones where needed to maintain safe driving conditions. Use flaggers and/or signage to safely direct traffic through construction work zones.
- For roadways requiring lane closures that would result in a single open lane, maintain alternate one-way traffic flow and utilize flagger-controls.
- Coordinate with facility owners or administrators of sensitive land uses such as police and fire stations, hospitals, and schools. Provide advance notification to the facility owner or operator of the timing, location, and duration of construction activities.

Tribal Cultural Resources

TCR-1 Prior to carrying out ground disturbing activities, the District shall enter into a Tribal Monitoring Services Agreement with the Agua Caliente Band of Cahuilla Indians for the project. The Tribal Monitor shall be onsite during all excavation and trenching activities. The Tribal Monitor shall have the authority to temporarily divert, redirect, or halt the excavation activities to allow identification, evaluation, and potential recovery of cultural resources.

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