

4 | RESPONSES TO COMMENTS

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1.0 INTRODUCTION

The Final Environmental Impact Report (Final EIR) for the proposed Coachella General Plan Update (CGPU or Project) has been prepared in accordance with the California Environmental Quality Act (CEQA) Guidelines and the City of Coachella policies for implementing CEQA. The following is an excerpt from the CEQA Guidelines Section 15132 that states:

“The Final EIR shall consist of:

- (a) The Draft EIR or a version of the draft.*
- (b) Comments and recommendations received on the Draft EIR either verbatim or in summary.*
- (c) A list of persons, organizations, and public agencies commenting on the Draft EIR.*
- (d) The responses of the Lead Agency to significant environmental points raised in the review and consultation process.*
- (e) Any other information added by the Lead Agency.”*

The Final EIR includes all of these required components. Volumes I and II are the Draft EIR and Draft EIR Appendices, respectively. This Volume III document includes all of the additional items needed to comprise the Final EIR.

In accordance with § 15088 of the State CEQA Guidelines, the City of Coachella, as the lead agency for the proposed Project, evaluated comments received on the Draft EIR (State Clearinghouse No. 2009021007) and has prepared the following responses to the comments received. The preceding Table of Contents provides of a list of all persons, organizations and public agencies commenting on the Draft EIR. Section 2.0 includes the Responses to Comments received by the City of Coachella on the Draft EIR. It should be noted that responses to comments also resulted in various editorial clarifications and corrections to the original Draft EIR text. Added or modified text is shown in Section 3.0, Errata, by underlining (example) while deleted text is shown by striking (example). The additional information, corrections, and clarifications are not considered to substantively affect the conclusions within the Draft EIR. This Response to Comments document is part of the Final EIR, which includes the Draft EIR pursuant to § 15132 of the State CEQA Guidelines.

After review and discussion by City staff and the City Planning Commission, responses to comments will be sent to commenting agencies in a separate response document. This satisfies the requirement of Section 21092.5 of CEQA to send responses to the public agency comments received on the Draft EIR at least 10 days prior to project approval. This document includes responses to all written and verbal comments received on the Draft EIR.

BACKGROUND

On March 8, 2013, the City of Coachella issued a Notice of Preparation (NOP) for the proposed Project to identify the potential environmental impacts of the project (refer to Draft Program EIR Appendix A). An NOP is a document that is sent by the lead agency to notify public agencies and interested parties that the lead agency plans to prepare an EIR for the project. The purpose of the NOP is to solicit comments from public agencies and interested parties, and to identify issues that should be considered in the EIR. The NOP for the proposed Project was sent to trustee and responsible agencies,

members of the public, other interested parties, and the California Office of Planning and Research, State Clearinghouse for the required 30-day public review period, which ended on April 15, 2013. During the review period, public agencies and members of the public had the opportunity to respond to the NOP to identify issues of special concern to them and to suggest additional issues to be considered in the EIR. In addition, the City held a public scoping meeting on March 14, 2013 to discuss characteristics of the proposed Project, its planning status, the nature of its potential environmental effects, and the scope (i.e., the specific issues) of the EIR analysis. The scoping meeting provided further opportunities for public input regarding environmental concerns and issues that should be addressed in the EIR.

The Draft EIR for the proposed Project was distributed to trustee and responsible agencies, members of the public, other interested parties, and the California Office of Planning and Research, State Clearinghouse on July 1, 2014. This began the public review period, which ended on September 15, 2014 according to the State Clearinghouse.

Section 3.0 includes any additional or clarifying information resulting from preparation of the Responses to Comments as well as any minor revisions (additions or deletions) to the text of the Draft EIR. Additionally, it should be noted that these Responses to Comments and Errata merely clarify, amplify, and expand on the fully adequate analysis and significance conclusions that were already set forth in the Draft EIR for public review. CEQA Guidelines Section 15088.5 makes clear that such clarifications and amplifications are appropriate under CEQA and do not require recirculation of the EIR. Specifically, Section 15088.5 states:

“(a) A lead agency is required to recirculate an EIR when significant new information is added to the EIR after public notice is given of the availability of the draft EIR for public review under Section 15087 but before certification. As used in this section, the term “information” can include changes in the project or environmental setting as well as additional data or other information. New information added to an EIR is not “significant” unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project’s proponents have declined to implement. “Significant new information” requiring recirculation includes, for example, a disclosure showing that:

(1) A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.

(2) A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.

(3) A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the significant environmental impacts of the project, but the project’s proponents decline to adopt it.

(4) The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.

(b) Recirculation is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR.”

As set forth in more detail in these Responses to Comments and Errata, none of the clarifications or amplifications set forth herein change the significance conclusions presented in the Draft EIR or the substantially alters the analysis presented for public review. Furthermore, the Draft EIR circulated for public review was fully adequate under CEQA such that meaningful public review was not precluded. Thus, the clarifications provided in these Responses to Comments and Errata do not constitute significant new information that might trigger recirculation.

2.0 COMMENTS AND RESPONSES

COMMENT LETTER 1

MR. SCOTT MORGAN, DIRECTOR, STATE CLEARINGHOUSE, STATE OFFICE OF PLANNING AND RESEARCH

1.1 This is a transmittal letter from the State Clearinghouse to the City of Coachella, simply indicating that the City has complied with CEQA notification procedures relative to State Agencies. No further response is required.

COMMENT LETTER 2

MR. JOHN LOWRIE, DEPARTMENT OF CONSERVATION

- 2.1 As noted in your letter, per state law, the City will not be able to rezone lands to urban uses if they are currently under Williamson Act contracts. Currently, there are no agricultural lands with Williamson Act agreements within the City limits. Riverside County LAFCO policies prohibit the City from annexing land prior to the landowner initiating cancellation of the Williamson Act contract. As the City will not be able to annex the land prior to cancellation initiation, the City will not have the authority to rezone land in a manner that would result in a conflict with the statutes of the Williamson Act. Should a land owner wish to pursue early cancellation of a contract, that would be their right and they would have to follow the procedures set forth by the Williamson Act statutes.
- 2.2 Comment noted. As set forth in Section 51281 of the Government Code, only landowners would have the right to request cancellation of Williamson Act contracts, not the City. As documented in the Land Use section of the DEIR, the City will be required to update its zoning code after the adoption of the CGPU. However, the City will not be able to rezone land outside of the City limits and no Williamson Act lands are within the City limits.
- 2.3 Comment noted. The DEIR does not include this analysis because the City does not have any information on how development might be phased relative to the lands covered by Williamson Act contracts. The CGPU does, however, set aside subareas 15 and 16 as development reserve areas. It is anticipated that all of the growth of the General Plan through 2035 could be accommodated without impacting any of the agricultural land in Subarea 16. Additionally, the proposed General Plan includes dozens of policies that address agricultural land preservation and seek to reduce the impact of urban development.
- 2.4 No measures have been left unconsidered by the CGPU. As detailed in Section 4.2 of the DEIR, the CGPU includes nearly 40 policies that identify how the City should protect agricultural lands and the agricultural economy in Coachella. In particular, Policy 5.4 of the Sustainability + Natural Environment Element specifically includes the use of conservation easements as a preservation tool.
- 2.5 Comment noted. A mitigation and monitoring program has been prepared in conjunction with this FEIR.

COMMENT LETTER 3

MR. EDWARD COOPER, RIVERSIDE COUNTY AIRPORT LAND USE COMMISSION

- 3.1 Comment noted and thank you for the summary on ALUC review of the General Plan.
- 3.2 Comment noted. This comment refers to the General Plan, but not the DEIR so no further responses will be made within this document.
- 3.3 Comment noted. We look forward to future discussions.

COMMENT LETTER 4

MR. STEVE BIGLEY, COACHELLA VALLEY WATER DISTRICT

- 3.1 Comment noted. The General Plan Update text has been updated with this clarification.
- 3.2 Comment noted. The General Plan Update text has been updated with this clarification.
- 3.3 Comment noted. The DEIR text has been update with this clarification.
- 3.4 Comment noted. The DEIR text has been update with this clarification.
- 3.5 Comment noted. Figure 4.7-1 and its associated text has been update with this clarification.
- 3.6 Comment noted. The DEIR text has been update with this clarification.
- 3.7 Comment noted. The DEIR text has been update with this correction.
- 3.8 Comment noted. The DEIR text has been update with this clarification.
- 3.9 Comment noted. The DEIR text has been update with this clarification.
- 3.10 Comment noted. The DEIR text has been update with this clarification.

COMMENT LETTER 5

MS. PATTIE GARCIA, AGUA CALIENTE BAND OF CAHUILLA INDIANS

- 4.1 The City welcomes any additional opportunity to coordinate and consult with the various Cahuilla tribes. Under SB 18, the City began consultation on June 27, 2013 with the various tribes. To date, the Aqua Caliente band is the only tribe that has responded.
- 4.2 For language regarding the area's history as the traditional use are of the Cahuilla's, please refer to Chapter 3, Existing Conditions, of the Draft General Plan. Additionally, Section 4.4, Cultural Resources, provides additional background on the Cahuilla's historic use of the area.
- 4.3 The City agrees with your assessment about identify resources prior to ground disturbance and has proposed several General Plan policies that would require early coordination with the Cahuilla as well as avoidance of potential resources whenever possible. Please refer to the Sustainability and Natural Environment Element of the Draft General Plan and Section 4.4 of the DEIR for more details on the City's approach to avoiding impacts to cultural resources.
- 4.4 The City agrees and requires such monitoring as a standard procedure in areas of high sensitivity.

COMMENT LETTER 6

PATRICK CISNEROS, DESERT SANDS UNIFIED SCHOOL DISTRICT

- 5.1 Comment noted. The City agrees that it is critical to identify appropriate school sites as the City grows. Accordingly, the Draft General Plan Land Use + Community Character includes Policy 8.3 that specifically directs the City to work with the School District to “size, design and locate schools.”
- 5.2 Comment noted and thank you for the Fee Justification Study. The City will take this study into consideration.
- 5.3 Comment noted. As stated above, the City understands the importance of setting aside land for public uses during the development process. The Draft General Plan (as documented by Section 4.15 of the DEIR) contains numerous policies that provide for the coordination of development with public facilities, concurrent development of new residential and non-residential in conjunction with public facilities, joint use of facilities, and the setting aside of land and/or the payment of fees for public facilities. Additionally, as shown on page 4-63 of the Draft General Plan, the new General Plan specifies a development process that would help identify the location of public facilities for facilities and services such as schools.
- 5.4 Comment noted. Clarifying text has been added to the DEIR.
- 5.5 Comment noted.
- 5.6 Comment noted.

COMMENT LETTER 7

MR. LES JOHNSON, CITY OF LA QUINTA

- 7.1 Thank you for your comment. Rural living and agricultural operations are very important to the City of Coachella. The urban-rural interface and the potential for land use conflicts was addressed in Section 4.2, Agricultural Resources, of the DEIR. Clarifying text has been added to Section 4.2.
- 7.2 Please see the first response to your letter. The presence of Regional Retail adjacent to rural residential uses does not unequivocally result in land use conflicts. As noted in Section 4.2, the Draft General Plan would require buffers between new urban development and existing rural and residential development so as to minimize potential land use conflicts.
- 7.3 We are unsure where the figure of 2.8 persons per household referenced in your comment letter was sourced. The General Plan growth projections used a factor of 3.5 persons per household for single-family residential and 2.5 persons per household for multifamily residential to estimate population growth. These numbers were based on a wide variety of factors to account for the shift in household size that is expected to occur with improved economic conditions, such as new local jobs, an increase in affordable housing, and an overall increase in housing diversity and housing choices. Additionally, the Draft General Plan reflects the community’s desire to reduce overcrowding as a key community health objective. As such, the existing and unacceptably high rate of 4.5 persons per household that reflects the current condition would not be an appropriate rate to use for projecting future population.
- 7.4 Please see Response 9.6 of the Lewis, Brisbois, Bisgaard, and Smith Letter.
- 7.5 This comment understates the level of analysis and planning which is reported in the Transportation Study and the EIR. While it is correct that detailed analysis was done at 19

intersections within the City, additional forecasting and operational analysis was done at over 60 directional roadway segments within the City addressing all major roadways within the City of Coachella as well as adjacent regional roadways. This combination of intersection and roadway segment analysis provides a comprehensive outlook on future transportation systems within the City for the forecast year.

- 7.6 The RivTAM update performed by Fehr & Peers for the City of Coachella included a refinement of both the roadway networks and zonal structure to add additional zones within the City of Coachella. Following this update, Fehr & Peers the revalidated RivTAM for facilities within the City of Coachella prior to developing future traffic forecasts. As the additional zonal detail referenced by the commenter was already completed, the forecasts provided by this updated traffic model can be considered to be appropriate for use in the General Plan and General Plan EIR.
- 7.7 The comment notes a number of instances in which the City of La Quinta Traffic Model or other documents provide different results from the City of Coachella Traffic Model. There are a number of reasons for these differences:
- As noted in Response 7.6, the roadway and zonal network within the City of Coachella was expanded to provide additional detail for both the Base Year and Future Year models. This additional roadway and zonal network details will have an effect on the results noted. In several instances, Fehr & Peers modified the roadway network coding to more accurately reflect additional parallel roadways which were not included in RivTAM. As intermediate roadways are often missing in RivTAM, forecasts for major regional facilities are often overstated as these parallel roadways are not present to provide alternative routes of travel. RivTAM then compensates by over allocating vehicles to these regional arterials.
 - The other primary reason is that the City has revisited and updated citywide growth allocations. The City has maintained regional control totals provided by agencies such as SCAG. However; the City has adjusted the geographic location where growth would occur. One significant change is that growth has been allocated to the La Entrada. Development, east of SR-86 South and made a corresponding reduction in growth in other locations throughout the City to maintain these control totals. As these growth allocations represent the most accurate information for the City of Coachella, the resulting traffic forecasts are considered to be the most appropriate representation of future traffic volumes. As the other sources cited by the commenter, such as the City of La Quinta Traffic Model were developed prior to these updated land use allocations, these differences in these results are to be expected.
- 7.8 This comment notes several instances in which the City of Coachella General Plan roadway classifications differ on adjacent segments. Such differences would not generally considered to be a fatal flaw or potentially even problematic. It is common for adjacent cities to apply different roadway classifications or configurations on the same roadway. This condition occurs commonly throughout areas of Southern California in Los Angeles, San Bernardino, and Riverside Counties. The differences noted above reflect instances in which there is a difference in only one travel lane in each direction, which can often be accommodated through appropriate transitions at intersections or through other design treatments.

COMMENT LETTER 8

MS. MICHELE HASSON, LEADERSHIP COUNSEL FOR JUSTICE & ACCOUNTABILITY, SUGUET LOPEZ, LIDERES CAMPESINAS, AND KAREN BORJA, ICUC

- 8.1 Comment noted. This is an introductory statement and further specific responses are provided below in response to specific comments.
- 8.2 We respectfully disagree that the DEIR does not satisfy the standard of identifying the existing setting with regards to mobile homes, unsafe drinking water and unsafe wastewater treatment, housing needs and information related to both circulation, air quality and greenhouse gases. First, we refer you to Section 4.13, Population and Housing, of the DEIR. This section includes a description of the five disadvantaged communities within the Planning Area, as defined by SB 244, and describes the infrastructure needs of each of these communities. These communities are largely comprised of mobile homes and lacking in much of the infrastructure mentioned in the comment. The existence of mobile homes is also identified in Section 4.8, Land Use and Planning. The DEIR also describes the water contamination issues in both Section 4.7, Hydrology and Water Quality, and Section 4.16, Water Supply and Wastewater. Section 4.11, Air Quality, identifies that the air basin is in non-attainment status for both federal and state air quality standards. Section 4.12, Greenhouse Gases, identifies existing greenhouse gas emissions for the City, the state, the United States, and the world. Finally, Section 4.9, Circulation, details the City's existing transportation network and operational status. Without further details on what additional information is overlooked in the DEIR, no further response is possible. Additionally, please see Policy 2.8, Mobile Home Parks, of the Community Health + Wellness Element, which provides the City with direction on balancing the need for affordable housing while protection the health and safety of mobile home residents.
- 8.3 We respectfully disagree. The 2013 Housing Element and the Draft General Plan were prepared in a parallel and iterative fashion so that the 2013 Housing Element would be based on the land use plan of the Draft General Plan.
- 8.4 This comment notes that there is inadequate analysis of disadvantaged communities in the General Plan and DEIR per SB 244. SB 244 requires that the General Plan identify and include an analysis of disadvantaged communities when a city's Housing Element update is conducted. Per SB 244, this analysis was conducted and five communities were determined to be disadvantaged. These communities, and their infrastructure needs, have been identified in Chapter 3, Existing Conditions, of the General Plan. Analysis of SB 244 communities is not required under CEQA. However, in Section 4.13, Population and Housing, the five SB 244 communities and their infrastructure needs are identified and described. If additional information regarding the two communities listed in the comment is available that would indicate why they should also be identified as disadvantaged communities, please provide that information to the City for analysis. Additionally, please see Policy 2.8, Mobile Home Parks, of the Community Health + Wellness Element, which provides the City with direction on balancing the need for affordable housing while protection the health and safety of mobile home residents.
- 8.5 We respectfully disagree that the DEIR inadequately assesses the displacement of housing in agricultural areas of the City or account for housing need with regards to substandard housing. Please see Impact 4.13-2 for a discussion of the displacement of housing. Additionally, please note that this analysis specifically identifies the possible impacts to disadvantaged communities in the Planning Area with implementation of the Draft General Plan. As noted above, Section 4.13 also includes the identification and of the City's disadvantaged communities and their associated needs. This is a highly unusual inclusion for a DEIR and shows the City's commitment to addressing the substandard housing needs in and around the City. Additionally,

please see Policy 2.8, Mobile Home Parks, of the Community Health + Wellness Element, which provides the City with direction on balancing the need for affordable housing while protection the health and safety of mobile home residents. Also, please see Policy 2.13, Housing Displacement, of the Community Health + Wellness Element, which requires special analysis for any development which would displace existing housing.

- 8.6 We respectfully disagree that the DEIR does not identify the existing setting with regards to unsafe drinking water and unsafe wastewater treatment. As described above, we refer you to Section 4.13, Population and Housing, of the DEIR. This section includes a description of the five disadvantaged communities within the Planning Area, as defined by SB 244, and describes the infrastructure needs of each of these communities, which includes an assessment of need for clean water, wastewater treatment, and stormwater control. The DEIR describes the water contamination issues in both Section 4.7, Hydrology and Water Quality, and Section 4.16, Water Supply and Wastewater. Additionally, Figure 3-6 of the Draft General Plan identifies areas in and around the City where elevated arsenic levels have been detected. Please note that an analysis of this existing condition and its existing impact on existing residents is outside the purview of the DEIR. The purpose of the DEIR is to analyze the effects of the proposed project, the Draft General Plan, on the existing environment. In the case of these existing infrastructure and housing deficiencies, the Draft General Plan and the DEIR present policies and analysis as to how new development and infrastructure construction will provide for the eventual upgrade of public services in the City.
- 8.7 We respectfully disagree that the DEIR inadequately assesses the displacement of housing in agricultural areas of the City or on low income homes. Please see Impact 4.13-2 for a discussion of the displacement of housing. Additionally, please note that this analysis specifically identifies the possible impacts to disadvantaged communities in the Planning Area with implementation of the Draft General Plan. The DEIR acknowledges that the Draft General Plan will not result in the direct displacement of housing or people but might encourage relocation pressure. The DEIR also discusses how the proposed project includes the provision of new housing within the City. The proposed project anticipates more than 33,000 new housing units. Of these, 18,264 are expected to be multifamily residential, which is a housing type that is sorely lacking in the City. The provision of such housing will surely help alleviate the situation of families living in substandard conditions through the provision of new affordable housing options. Additionally, please see Policy 2.8, Mobile Home Parks, of the Community Health + Wellness Element, which provides the City with direction on balancing the need for affordable housing while protection the health and safety of mobile home residents. Also, please see Policy 2.13, Housing Displacement, of the Community Health + Wellness Element, which requires special analysis for any development which would displace existing housing.
- 8.8 Comment noted. However, Action 2.4 of the Housing Element is not a part of this project. The 2013 Housing Element is a separate project analyzed under a separate CEQA document.
- 8.9 We respectfully disagree. Please refer to comment 8.7.
- 8.10 Comment noted. Please refer to the City's Certified Housing Element, which is the component of the General Plan that addresses housing affordability. Housing affordability is a critical state objective and the City's Housing Element provides an adequate analysis of housing affordability. Table 1 of the Housing Element identifies that, under the Draft General Plan, 384 Extremely Low, 384 Very Low, and 558 Low Income housing units will be built by 2021. These 1326 affordable housing units represent an increase of nearly 15% of the City's existing 8995 households and provide more than adequate capacity should all of the residents of the City's disadvantaged communities need to find new housing. Furthermore, as identified by the City's Housing Element, only 110 housing units are currently lacking complete plumbing facilities,

which can be a proxy indicator for substandard units. Thus, the Draft General Plan will provide ten times more affordable housing units than those substandard housing units without plumbing facilities found within the Planning Area. Additionally, please see Policy 2.8, Mobile Home Parks, of the Community Health + Wellness Element, which provides the City with direction on balancing the need for affordable housing while protection the health and safety of mobile home residents. Also, please see Policy 2.13, Housing Displacement, of the Community Health + Wellness Element, which requires special analysis for any development which would displace existing housing.

- 8.11 We respectfully disagree that the DEIR fails to account for the disproportionate impact of industrial units on low-income communities. The City of Coachella’s median income is nearly \$14,000 less than that of Riverside County and the vast majority of the City’s communities are low income. Nonetheless, environmental justice was a very important community value that guided the development of the plan. The Sustainability and Natural Environment Element includes multiple policies under Goal 11, Air Quality, that specifically address the siting of sensitive receptors and pollution sources in close proximity to one another.
- 8.12 Comment noted. However this comment is a critique of a policy of the Draft General Plan and does not relate to the analysis of the DEIR. Therefore, no additional response is necessary.
- 8.13 We respectfully disagree that the DEIR fails to sufficiently analyze resulting GHG impacts, air quality impacts or circulation impacts. The DEIR traffic, GHG, and air quality analyses take into account the reduction in vehicle miles traveled that would be realized by the shift of trips to bicycle, pedestrian, and transit, as well as the reduction in trip length that would come from a more compact urban form and an improved jobs-housing balance. Additionally, these analyses include the assumption that many residents of Coachella will have to continue to leave the City for their jobs. This fact is demonstrated by the conclusions in Section 4.9, Circulation, of the DEIR which identify that the Draft General Plan will result in significant unavoidable impacts to regional roadways due to residents commuting out of town for jobs. As noted above, the Housing Element of the General Plan anticipates 1326 affordable housing units under the Draft General Plan. Additionally, the Draft General Plan supports affordable housing in its own right through multiple policies that support the construction of affordable housing throughout the City.
- 8.14 Thank you for your comment. We are unsure what policies of the Draft General Plan would hinder annexation efforts in Subarea 5. Additionally, it is unclear to the City how the General Plan would unfairly limit residential development. The Neighborhood Center and Urban Employment Center land use designations of Subarea 5 both allow for residential development in a multifamily, mixed-use format.

COMMENT LETTER 9

Ms. KELLY ALHADEFF-BLACK, LEWIS BRISBOIS BISGAARD & SMITH

- 9.1 Comment noted. This language has been changed to show La Entrada is an approved Specific Plan. It DEIR did not find any inconsistencies between the La Entrada Specific Plan and the Draft General Plan. However, the General Plan is the guiding document for the City and all Specific Plans, Master Plans, Design Guidelines, and Development Standards used by the City of Coachella must be consistent with the General Plan.
- 9.2 Comment noted. The DEIR did take the La Entrada EIR findings and conclusions into consideration in the preparation of the analysis of the proposed General Plan.
- 9.3 Comment noted.

- 9.4 Comment noted. This language has been updated.
- 9.5 The General Plan Mobility Element identified Avenues 50 and 52 as Major Arterials which allow a maximum width of up to six lanes, recognizing that not all of the roadways with that designation would be built to their ultimate configuration. The La Entrada Plan designation of those roadways as four-lane facilities would therefore be consistent with that designation. The EIR section will therefore be updated to note the proposed roadway widths and their consistency with the General Plan roadway designation.
- 9.6 The General Plan Mobility Element acknowledges this interchange by including the interchange and an extension of Avenue 50 north to I-10 on the Circulation Element future roadway map. Additionally, this proposed interchange had been included in several previous documents prepared by the Coachella Valley Association of Governments such as the 2010 Transportation Project Prioritization Study (TPPS), which included the extension of Avenue 50 and the I-10/Avenue 50 interchange on the list of potential projects. Given the references to the interchange on the Mobility Element map and references in other planning documents prepared by other agencies, adding additional references to the interchange would be duplicative.
- 9.7 Comment noted. This language has been updated.
- 9.8 The work on the General Plan and General Plan EIR was initiated in 2011. At that time, City Staff and the EIR Consultants reviewed available data and determined how best to proceed with the analysis of existing conditions. The primary issue at that time was the significant economic downturn which the City experienced beginning in 2007, continuing through 2011. One facet of this downturn was a measurable slowing in the City's population growth rate from previous levels. There were also high levels of residential foreclosures as compared to other areas of Riverside County. Because of these economic conditions, the Project Team recommended that the City use data from prior to the recession where possible and appropriate. As the City had completed a citywide traffic study in 2007, these traffic counts were used in the assessment of existing conditions for the EIR. While we acknowledge newer traffic data is available from selected locations which were analyzed in the La Entrada EIR, the citywide traffic study represents a comprehensive data which provide an accurate reflection of traffic conditions at the time the data was collected.
- 9.9 The General Plan and EIR consultants, in conjunction with City Staff, extensively discussed the topic of build out projections. The General Plan and Mobility Element analyzed a 20-year growth projection for the City based on data from SCAG and other sources. A key differentiator of these build out projections is that they are constrained by residential and commercial absorption rates, rather than using planned development totals as have been historically done in the Coachella Valley and other locations. Using this constrained growth project allows the City to prioritize infrastructure improvements and also to direct growth consistent with the General Plan goals and policies. As this approach is allowable under CEQA and has been used in other General Plans and EIR's, no additional analysis of total build out is required or necessary.

9.10 Page 4-39 of the Draft EIR contains the following statements:

Regional roadways are expected to experience significant and unavoidable congestion impacts from the CGPU and regional growth in the Coachella Valley. These facilities are impacted by both by the proposed General Plan land uses and also by the growth in areas outside of Coachella since these roadways are regional facilities that serve both local and regional traffic. As such, the impact to these facilities cannot be fully mitigated and the impact remains significant and unavoidable.

Additionally, with the development of the General Plan and development in areas outside of the City, I-10 will operate at LOS E and F and SR-86 South will operate at LOS F based on future traffic

conditions, generating significant congestion impacts within the Planning Area. However, mitigation measures are beyond the City of Coachella’s jurisdictional power, and as such, significant and unavoidable impacts to occur on a regional scale.

As we have already noted that improving these facilities is beyond the control of the City of Coachella, no additional clarification is necessary.

- 9.11 The DEIR is a compilation and summary of several technical studies, including a detailed Transportation Study which was included (Appendix 11.4). Detailed information regarding the methodology, approach, and tools used for the future traffic analysis is provided in this appendix. Specific items noted in the Transportation Study include:
- A discussion regarding the development and application of a local traffic model for the City of Coachella, derived from the Countywide RIVTAM Travel Demand Model
 - A documentation of peak hour traffic volumes for the AM and PM Peak Hours
 - Calculation sheets for the intersection LOS results

As this detailed information is provided in the Transportation Study, it would be duplicative to also provide this information in the EIR as well.

- 9.12 The X within the LOS designations is a typographic error. The LOS results should read “F, E, D, and E.” Table 4.9-6 will be updated to remove the incorrect information. There is no change to the results or conclusion of the Transportation Study or the EIR.

- 9.13 Comment noted.

COMMENT LETTER 10

MR. PAUL DEPALATIS, MSA CONSULTING, INC.

- 10.1 Correct, the DEIR does not analyze the physical impacts of new business under the Draft General Plan on existing businesses with respect to blight. Economic impacts, and presumably resulting physical blight, are not standard issues for review under CEQA. The General Plan and Mobility Element analyzed a 20-year growth projection for the City based on data from SCAG and other sources. In addition to using this information to inform the growth projections, the Draft General Plan growth projections are also based on balancing both jobs-housing and retail jobs-housing in the City of Coachella. The 2035 growth projection anticipates a jobs-housing ratio of 0.73 and a retail jobs-housing ratio. While both of these ratios are notable improvements for the City of Coachella, they also indicate the City of Coachella in 2035 would still have a relatively low square-footage of non-residential, and specifically retail, for a population of 135,000. Given that these numbers indicate Coachella will still be very much a bedroom community in 2035, the City found no indication that planning for new retail would result in an economic impact on new businesses such that blight would occur. Additionally, this DEIR is a programmatic document analyzing a long-range plan. It is within the City’s means to plan for additional retail development, but it is not within the City’s means to create new retail development. New retail development will not occur until new homes are built in Coachella and the population increases to a point such that there will be a greater market to support new retail development. The City understands this market dynamic and patiently anticipates a future when the population will support new retail opportunities.
- 10.2 Thank you for your comment. However, the City respectfully disagrees. Per the parameters spelled out in the Draft General Plan, the Shadow View Specific Plan would be considered an

auto-oriented suburban development pattern. Characteristics such as large blocks, a tiered roadway system, and the separation of residential and commercial areas. This pattern does not exhibit the level of connectivity and walkability envisioned by the community, even for the suburban residential development anticipated by the Draft General Plan.

- 10.3 The City respectfully disagrees. The General Plan is the guiding document for all future development and tools such as Specific Plans, zoning codes, and subdivision ordinances are implementing mechanisms of the General Plan. It is a regular occurrence for a City to update its Specific Plans, zoning codes, and other implementation tools following a General Plan update to bring those tools into conformance with a new General Plan. In cases where an entitlement was vested, the City would have fewer legal options to change a Specific Plan. However, in the case of the Shadow View Specific Plan, the Development Agreement was invalidated when the land owners failed to meet its terms.
- 10.4 Thank you for your comment. The City finds that the approach to allocating land use by subarea in terms of a range of potential uses is an appropriate methodology for planning for several decades of future development. The DEIR is a programmatic environmental analysis of a long-term policy document and it is entirely reasonable to build flexibility into the plan so as to realize a resilient plan that can adjust to market shifts. The traffic analysis that informs the DEIR is predicated upon multiple reasonable assumptions about growth in the City over the next 20 years. As such, the traffic analysis provides a reasonable presentation of the potential traffic impacts that could be expected by 2035. Additionally, the traffic analysis, like all traffic modeling activities, assesses traffic generation based on Traffic Analysis Zones, or TAZs, which typically cover large geographic areas when conducting analyses for areas as big as the City of Coachella. The City has no guarantee that growth will occur as anticipated by traffic analysis and, as such, it is unreasonable to assume that the traffic analysis would be the guiding document for how and when development would occur in the City. Should a development proposal be made to the City in the future that is substantively different from the assumptions of the Draft General Plan and DEIR, it will be for the City and/or the applicant to determine whether a subsequent project-level environmental analysis is merited to fully explore the potential and differing traffic impacts of the proposed project.
- 10.5 The DEIR does not analyze the roadway network of the Shadow View Specific Plan because it is the intent of the Draft General Plan to realize a different for that area of the City. Thus, the DEIR analyzes the City's preferred roadway network. As your letter notes, the potential inconsistency of the Shadow View Specific Plan and the Draft General Plan are addressed in the Land Use section of the DEIR.
- 10.6 Comment noted.

COMMENT LETTER 11

MR. CHIP LESLIE, RBF CONSULTING

- 11.1 Thank you for your comments. These comments pertain to the Draft General Plan. The City will take these into consideration.
- 11.2 Comment noted. The Draft General Plan growth projections for Subarea 11, of which the Shadow View Specific Plan is a part of, anticipate the development of approximately 2,100 single-family homes, 4,700 multifamily homes, 2,700,000 square feet of retail/commercial development, and 700,000 square feet of office development by 2035. In conformance with the broader vision of the General Plan, Subarea 11 is envisioned to be a more walkable, more urban place than originally anticipated by the previous General Plan or the Shadow View

Specific Plan. While it is reasonable to consider that less intense development in Subarea 11 might be environmentally superior than the Draft General Plan, this area has been planned with increased intensity in a more urban pattern so as to realize the environmental and public health benefits that can be achieved by shifting from auto-oriented suburban development patterns such as those that would occur under the development scenario of the Shadow View Specific Plan.