

11.2 | NOP/IS COMMENTS

PUBLIC UTILITIES COMMISSION

320 WEST 4TH STREET, SUITE 500
LOS ANGELES, CA 90013
(213) 576-7083



March 18, 2013

Luis Lopez
City of Coachella
1515 Sixth Street
Coachella, CA 92236

Dear Mr. Lopez:

Re: SCH 2009021007 Coachella General Plan Update NOP

The California Public Utilities Commission (Commission) has jurisdiction over the safety of highway-rail crossings (crossings) in California. The California Public Utilities Code requires Commission approval for the construction or alteration of crossings and grants the Commission exclusive power on the design, alteration, and closure of crossings in California. The Commission Rail Crossings Engineering Section (RCES) is in receipt of the *Notice of Preparation (NOP)* for the proposed City of Coachella (City) General Plan Update Project.

The project site area includes railroad tracks running through. RCES recommends that the City add language to the General Plan Update so that any future development adjacent to or near the shared railroad/light rail right-of-way (ROW) is planned with the safety of the rail corridor in mind. New developments may increase traffic volumes not only on streets and at intersections, but also at at-grade crossings. This includes considering pedestrian circulation patterns or destinations with respect to railroad ROW and compliance with the Americans with Disabilities Act. Mitigation measures to consider include, but are not limited to, the planning for grade separations for major thoroughfares, improvements to existing at-grade crossings due to increase in traffic volumes and continuous vandal resistant fencing or other appropriate barriers to limit the access of trespassers onto the railroad ROW.

If you have any questions in this matter, please contact me at (213) 576-7076, ykc@cpuc.ca.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "Ken Chiang".

Ken Chiang, P.E.
Utilities Engineer
Rail Crossings Engineering Section
Safety and Enforcement Division

C: State Clearinghouse

NATIVE AMERICAN HERITAGE COMMISSION

915 CAPITOL MALL, ROOM 364
SACRAMENTO, CA 95814
(916) 653-6251
ds_nahc@pacbell.net
www.nahc.ca.gov
(916) 657-5390 - Fax



March 12, 2013

Mr. Luis Lopez, City Planner

City of Coachella

1515 Sixth Street
Coachella, CA 92236

RE: SCH# 2009021007 CEQA Notice of Preparation (NOP); draft Environmental Impact Report (DEIR) – **“Coachella General Plan Update Project;”** located in the City of Coachella; Riverside County, California

Dear Mr. Lopez:

The Native American Heritage Commission (NAHC) has reviewed the CEQA Notice regarding the above referenced project. In the 1985 Appellate Court decision (170 Cal App 3rd 604), the court held that the NAHC has jurisdiction and special expertise, as a state agency, over affected Native American resources impacted by proposed projects, including archaeological places of religious significance to Native Americans, and to Native American burial sites.

The California Environmental Quality Act (CEQA) states that any project that causes a substantial adverse change in the significance of an historical resources, which includes archeological resources, is a significant effect requiring the preparation of an EIR (CEQA guidelines 15064(b)). To adequately comply with this provision and mitigate project-related impacts on archaeological resources, the Commission recommends the following actions be required:

- ✓ Contact the appropriate Information Center for a record search to determine:
 - If a part or all of the area of project effect (APE) has been previously surveyed for cultural resources, which we know that it has.
 - The NAHC recommends that known cultural resources recorded on or adjacent to the APE be listed in the draft Environmental Impact Report.
- ✓ If an additional archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey. We suggest that this be coordinated with the NAHC, if possible.
 - The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum, and not be made available for public disclosure pursuant to California Government Code Section 6254.10.
- ✓ Contact has been made to the the Native American Heritage Commission for:
 - A Sacred Lands File Check, and cultural resources have been identified to your agency.
 - A list of appropriate Native American Contacts for consultation concerning the project site has been provided and is attached to this letter.
 - Lack of surface evidence of archeological resources does not preclude their subsurface existence once ground-breaking activity begins. If that occurs, the NAHC suggests that inadvertent discoveries be coordinated with the NAHC;

Lead agencies should include in their mitigation plan provisions for the identification and evaluation of accidentally discovered archeological resources, per California Environmental Quality Act (CEQA) §15064.5(f). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally

NATIVE AMERICAN HERITAGE COMMISSION

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affiliated Native American, with knowledge in cultural resources, should monitor all ground-disturbing activities.

- Lead agencies should include in their mitigation plan provisions for the disposition of recovered artifacts, in consultation with culturally affiliated Native Americans.
- Lead agencies should include provisions for discovery of Native American human remains in their mitigation plan. Health and Safety Code §7050.5, CEQA §15064.5(e), and Public Resources Code §5097.98 mandates the process to be followed in the event of an accidental discovery of any human remains in a location other than a dedicated cemetery.

Sincerely,

A handwritten signature in blue ink, appearing to read "Dave Singleton".

Dave Singleton
Program Analyst
(916) 653-6251

CC: State Clearinghouse

Attachment: Native American Contacts list

**Native American Contacts
Riverside County
March 12, 2013**

Cabazon Band of Mission Indians
David Roosevelt, Chairperson
84-245 Indio Springs Cahuilla
Indio , CA 92203-3499
(760) 342-2593
(760) 347-7880 Fax

Santa Rosa Band of Mission Indians
John Marcus, Chairman
P.O. Box 391820 Cahuilla
Anza , CA 92539
(951) 659-2700
(951) 659-2228 Fax

Los Coyotes Band of Mission Indians
Shane Chapparosa, Chairman
P.O. Box 189 Cahuilla
Warner , CA 92086
(760) 782-0711
(760) 782-2701 - FAX

Augustine Band of Cahuilla Mission Indians
Mary Ann Green, Chairperson
P.O. Box 846 Cahuilla
Coachella , CA 92236
(760) 398-4722
760-369-7161 - FAX

Ramona Band of Cahuilla Mission Indians
Joseph Hamilton, Chairman
P.O. Box 391670 Cahuilla
Anza , CA 92539
admin@ramonatiribe.com
(951) 763-4105
(951) 763-4325 Fax

Morongo Band of Mission Indians
Michael Contreras, Cultural Heritage Prog.
12700 Pumarra Road Cahuilla
Banning , CA 92220 Serrano
(951) 201-1866 - cell
mcontreras@morongo-nsn.
gov
(951) 922-0105 Fax

Torres-Martinez Desert Cahuilla Indians
Mary Resvaloso, Chairperson
PO Box 1160 Cahuilla
Thermal , CA 92274
mresvaloso@torresmartinez.
(760) 397-0300
(760) 397-8146 Fax

Torres-Martinez Desert Cahuilla Indians
Diana L. Chihuahua, Vice Chairperson, Cultural
P.O. Box 1160 Cahuilla
Thermal , CA 92274
mkrystall@tmdci-nsn.gov
760) 397-0300, Ext. 1209
(760) 272-9039 - cell (Lisa)
(760) 397-8146 Fax

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of the statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

This list is only applicable for contacting local Native Americans with regard to cultural resources for the proposed SCH#2009021007; CEQA Notice of Preparation (NOP); draft Environmental Impact Report (DEIR) for the City of Coachella General Plan Update; located in the City of Coachella; Riverside County, California.

Native American Contacts
Riverside County
March 12, 2013

Cabazon Band of Mission Indians
Judy Stapp, Director of Cultural Affairs
84-245 Indio Springs Cahuilla
Indio , CA 92203-3499
(760) 342-2593
jstapp@cabazonindians-nsn.
gov
(760) 347-7880 Fax

Agua Caliente Band of Cahuilla Indians THPO
Patricia Tuck, Tribal Historic Preservation Officer
5401 Dinah Shore Drive Cahuilla
Palm Springs, CA 92264
ptuck@augacaliente-nsn.gov
(760) 699-6907

(760) 699-6924- Fax

Augustine Band of Cahuilla Mission Indians
Karen Kupcha
P.O. Box 849 Cahuilla
Coachella , CA 92236
(760) 398-4722
916-369-7161 - FAX

Cahuilla Band of Indians
Luther Salgado, Chairperson
PO Box 391760 Cahuilla
Anza , CA 92539
tribalcouncil@cahuilla.net
915-763-5549

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of the statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

This list is only applicable for contacting local Native Americans with regard to cultural resources for the proposed SCH#2009021007; CEQA Notice of Preparation (NOP); draft Environmental Impact Report (DEIR) for the City of Coachella General Plan Update; located in the City of Coachella; Riverside County, California.



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178

(909) 396-2000 • www.aqmd.gov

Send to Joe

March 29, 2013

Luis Lopez
City of Coachella
Development Services Department
1515 Sixth Street
Coachella, CA 92236

Notice of Preparation of a CEQA Document for the Coachella General Plan Update

The South Coast Air Quality Management District (SCAQMD) appreciates the opportunity to comment on the above-mentioned document. The SCAQMD's comments are recommendations regarding the analysis of potential air quality impacts from the proposed project that should be included in the draft CEQA document. Please send the SCAQMD a copy of the Draft EIR upon its completion. Note that copies of the Draft EIR that are submitted to the State Clearinghouse are not forwarded to the SCAQMD. Please forward a copy of the Draft EIR directly to SCAQMD at the address in our letterhead. **In addition, please send with the draft EIR all appendices or technical documents related to the air quality and greenhouse gas analyses and electronic versions of all air quality modeling and health risk assessment files. These include original emission calculation spreadsheets and modeling files (not Adobe PDF files). Without all files and supporting air quality documentation, the SCAQMD will be unable to complete its review of the air quality analysis in a timely manner. Any delays in providing all supporting air quality documentation will require additional time for review beyond the end of the comment period.**

Air Quality Analysis

The SCAQMD adopted its California Environmental Quality Act (CEQA) Air Quality Handbook in 1993 to assist other public agencies with the preparation of air quality analyses. The SCAQMD recommends that the Lead Agency use this Handbook as guidance when preparing its air quality analysis. Copies of the Handbook are available from the SCAQMD's Subscription Services Department by calling (909) 396-3720. The lead agency may wish to consider using land use emissions estimating software such as the recently released CalEEMod. This model is available on the SCAQMD Website at: <http://www.aqmd.gov/ceqa/models.html>.

The Lead Agency should identify any potential adverse air quality impacts that could occur from all phases of the project and all air pollutant sources related to the project. Air quality impacts from both construction (including demolition, if any) and operations should be calculated. Construction-related air quality impacts typically include, but are not limited to, emissions from the use of heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings, off-road mobile sources (e.g., heavy-duty construction equipment) and on-road mobile sources (e.g., construction worker vehicle trips, material transport trips). Operation-related air quality impacts may include, but are not limited to, emissions from stationary sources (e.g., boilers), area sources (e.g., solvents and coatings), and vehicular trips (e.g., on- and off-road tailpipe emissions and entrained dust). Air quality impacts from indirect sources, that is, sources that generate or attract vehicular trips should be included in the analysis.

The SCAQMD has developed a methodology for calculating PM_{2.5} emissions from construction and operational activities and processes. In connection with developing PM_{2.5} calculation methodologies, the SCAQMD has also developed both regional and localized significance thresholds. The SCAQMD requests that the lead agency quantify PM_{2.5} emissions and compare the results to the recommended PM_{2.5} significance thresholds. Guidance for calculating PM_{2.5} emissions and PM_{2.5} significance thresholds can be found at the following internet address: http://www.aqmd.gov/ceqa/handbook/PM2_5/PM2_5.html.

In addition to analyzing regional air quality impacts the SCAQMD recommends calculating localized air quality impacts and comparing the results to localized significance thresholds (LSTs). LST's can be used in addition to the recommended regional significance thresholds as a second indication of air quality impacts when preparing a CEQA document. Therefore, when preparing the air quality analysis for the proposed project, it is recommended that the lead agency perform a localized significance analysis by either using the LSTs developed by the SCAQMD or performing dispersion modeling as necessary. Guidance for performing a localized air quality analysis can be found at <http://www.aqmd.gov/ceqa/handbook/LST/LST.html>.

In the event that the proposed project generates or attracts vehicular trips, especially heavy-duty diesel-fueled vehicles, it is recommended that the lead agency perform a mobile source health risk assessment. Guidance for performing a mobile source health risk assessment ("Health Risk Assessment Guidance for Analyzing Cancer Risk from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis") can be found on the SCAQMD's CEQA web pages at the following internet address: http://www.aqmd.gov/ceqa/handbook/mobile_toxic/mobile_toxic.html. An analysis of all toxic air contaminant impacts due to the decommissioning or use of equipment potentially generating such air pollutants should also be included.

Mitigation Measures

In the event that the project generates significant adverse air quality impacts, CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized during project construction and operation to minimize or eliminate significant adverse air quality impacts. To assist the Lead Agency with identifying possible mitigation measures for the project, please refer to Chapter 11 of the SCAQMD CEQA Air Quality Handbook for sample air quality mitigation measures. Additional mitigation measures can be found on the SCAQMD's CEQA web pages at the following internet address: www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html Additionally, SCAQMD's Rule 403 – Fugitive Dust, and the Implementation Handbook contain numerous measures for controlling construction-related emissions that should be considered for use as CEQA mitigation if not otherwise required. Other measures to reduce air quality impacts from land use projects can be found in the SCAQMD's Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning. This document can be found at the following internet address: <http://www.aqmd.gov/prdas/aqguide/aqguide.html>. In addition, guidance on siting incompatible land uses can be found in the California Air Resources Board's Air Quality and Land Use Handbook: A Community Perspective, which can be found at the following internet address: <http://www.arb.ca.gov/ch/handbook.pdf>. CARB's Land Use Handbook is a general reference guide for evaluating and reducing air pollution impacts associated with new projects that go through the land use decision-making process. Pursuant to state CEQA Guidelines §15126.4 (a)(1)(D), any impacts resulting from mitigation measures must also be discussed.

Data Sources

SCAQMD rules and relevant air quality reports and data are available by calling the SCAQMD's Public Information Center at (909) 396-2039. Much of the information available through the Public Information Center is also available via the SCAQMD's World Wide Web Homepage (<http://www.aqmd.gov>).

The SCAQMD staff is available to work with the Lead Agency to ensure that project-related emissions are accurately identified, categorized, and evaluated. If you have any questions regarding this letter, please call Ian MacMillan, Program Supervisor, CEQA Section, at (909) 396-3244.

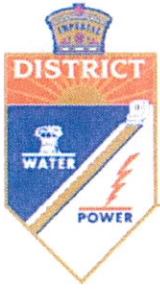
Sincerely,



Ian MacMillan

Program Supervisor, CEQA Inter-Governmental Review
Planning, Rule Development & Area Sources

IM
RVC130314-13
Control Number



IID

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Executive-ES

April 10, 2013

Mr. Luis Lopez
Development Services Director
Development Services Dept.
City of Coachella
1515 Sixth Street
Coachella, CA 92236

SUBJECT: NOI to Prepare a DEIR for the Coachella General Plan Update

Dear Mr. Lopez:

Pursuant to the City of Coachella's issuance of a Notice of Intent (NOI) to prepare a Draft Environmental Impact Report (DEIR) for the Coachella Comprehensive General Plan Update (Update), where the update encompasses future community development plans for 18,564 acres within the City limits as well as the integration of 14,755 additional acres within the City's Sphere of Influence, from the present up to the year 2035, the Imperial Irrigation District (IID) has reviewed the document and has the following comments:

1. A preliminary review of the Update has determined there will be a substantial impact on the IID electrical system within the areas proposed to be developed. The cumulative impact of development plans of this size increase the electrical demand on the IID's existing facilities at peak loading periods, and result in the need for additional generation, transmission, substation and distribution facilities. Development of this magnitude requires IID to construct and maintain a great deal of additional electrical infrastructure.
2. IID has ascertained that limited service may be available to serve the initial phases of development considered under the Update. However, based on the preliminary information, the proposed development would necessitate the construction of multiple electrical substations and possibly an electrical switching station within the City of Coachella. IID will not be able to determine the number of additional substation sites needed until specific load information for the proposed land uses is provided by developers.
3. In anticipation of the proposed development, existing 161kV and 92kV electrical transmission lines may need to be relocated and/or upgraded. IID asks that additional rights-of-way be provided for possible future transmission lines.

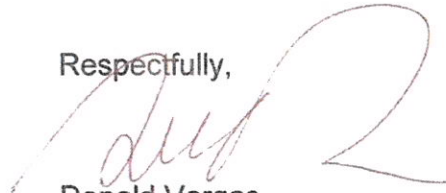
Additionally, the developers shall bear all costs associated with the construction of any additional transmission lines needed to extend sufficient electrical service to the proposed development.

4. The IID's policy provides that electrical facilities will be extended, whenever possible, to only those developments that have obtained the necessary approval of the City, Riverside County Planning Commission or other governmental authority having jurisdiction over said developments. Proposed land uses developers shall provide or acquire all easements and rights-of-way needed for any line extension(s), including transmission and distribution, relating to the proposed development prior to the installation of electrical service. Line extensions to serve this facility will be made in accordance with IID Regulations No. 15 and No. 2.
5. It shall be the sole responsibility of the developer to provide the substation site(s) needed (fee title) to provide electrical service to the future development areas. IID's minimum standard for an electrical substation site is 315' by 315'. All requirements relating to substation site development, including but not limited to the following: environmental compliance documentation, land improvements (on-site, off-site, as conditioned by the City or County), as well as all rights-of-way and easements for transmission line corridors needed to extend service to said substation site(s), shall be borne by the developer. In addition to the dedication of the electrical substation site(s) and rights-of-way needed to extend transmission service to the substation site(s), the developer shall bear all costs associated with the construction of the electrical substations and transmission lines needed to bring electrical service to aforementioned substation(s).
6. For additional information on items no. 1 through 5, please contact IID-Energy La Quinta Division Customer Operations and Planning Section, 81-600 Avenue 58 La Quinta, CA 92253, at (760) 398-5863 and (760) 398-5841.
7. Any construction or operation on IID property or within its existing and proposed rights-of-way or easements will require an encroachment permit or encroachment agreement (depending on the circumstances), including but not limited to: surface improvements such as proposed new streets, driveways, parking lots, landscape; and all water, sewer, storm water, or any other above ground or underground utilities. No foundations, buildings or leach lines will be allowed within IID's right of way. A copy of the encroachment permit application is included in the IID's *Developer Project Guide 2008*, accessed at the IID website: <http://www.iid.com/Modules/ShowDocument.aspx?documentid=2328>. In addition, instructions for the completion of encroachment applications can be found at <http://www.iid.com/Modules/ShowDocument.aspx?documentid=2335>. The IID Real Estate Section should be contacted at (760) 339-9239 for additional information regarding encroachment permits.

8. Any new, relocated, modified or reconstructed IID facilities required for and by the project (which can include but is not limited to electrical utility substations, electrical transmission and distribution lines, canals, drains, etc.) need to be included as part of the project's CEQA and/or NEPA documentation, environmental impact analysis and mitigation. Failure to do so will result in postponement of any construction and/or modification of IID facilities until such time as the environmental documentation is amended and environmental impacts are fully mitigated. **Any and all mitigation necessary as a result of the construction, relocation and/or upgrade of IID facilities is the responsibility of the project proponent.**

Should you have any questions, please do not hesitate to contact me by phone at 760-482-3609 or by e-mail at dvargas@iid.com. Thank you for the opportunity to comment on this matter.

Respectfully,



Donald Vargas
Environmental Analyst

Kevin Kelley – General Manager
Jesse Silva – Manager, Water Dept.
Carl Stills – Interim Manager, Energy Dept.
Vance Taylor – Asst. General Counsel
Tom King – Interim Project Management Officer, Portfolio Mgmt. Office
Carlos Villalon – Asst. Mgr., Water Dept. System Control & Monitoring
Juan Carlos Sandoval – Asst. Mgr., Energy Dept. System Planning
Michael P. Kemp – Interim Superintendent, Environmental & Real Estate
Shayne Ferber – Asst. Supervisor, Real Estate
Vikki Dee Bradshaw – Asst. Supervisor, Environmental Services



Established in 1918 as a public agency

Coachella Valley Water District

Directors:
John P. Powell, Jr., President - Div. 3
Franz W. De Klotz, Vice President - Div. 1
Ed Pack - Div. 2
Peter Nelson - Div. 4
Dabi Livesay - Div. 5

Officers:
Jim Barrett, Acting General Manager
Julia Fernandez, Board Secretary

Redwine and Sherrill, Attorneys

April 2, 2013

File: 1150.10

Luis Lopez
Development Services Department
City of Coachella
1515 Sixth Street
Coachella, CA 92236

Dear Mr. Lopez:

Subject: Notice of Preparation of Draft Environmental
Impact Report for Coachella General Plan Update

Thank you for affording the Coachella Valley Water District (CVWD) the opportunity to review the Notice of Preparation (NOP) of a Draft Environmental Impact Report (EIR) for the Coachella General Plan Update.

CVWD provides domestic water, wastewater, recycled water, irrigation/drainage, regional stormwater protection and groundwater management services to a population of nearly 300,000 throughout the Coachella Valley.

CVWD and the City of Coachella (City) have worked cooperatively over the last several years to ensure robust water resource planning for the Coachella Valley. The Coachella Valley Water Management Plan 2010 Update, Integrated Regional Water Management Plan, our respective Urban Water Management Plans and specific water resource service Master Plans should be considered as part of the Coachella General Plan Update and EIR.

In addition, CVWD and the City have executed four water resource agreements that should be considered as part of the Coachella General Plan Update and EIR. These include:

1. Agreement (6/5/79) – Provides terms for City sewer service to CVWD sanitation customers in the South Jackson Street area.
2. Agreement (1/9/08) – Established water and sewer service boundaries.
3. Memorandum of Understanding (Water Plan MOU) (9/9/09) – The City agreed to comply with the water conservation goals of the Coachella Valley Water Management Plan (CVWMP) and provide for a supplemental source of domestic water for City development projects. CVWD agreed to include City water demands in future updates of the CVWMP and provide a supplemental source of domestic water for the City if the City chose to contribute to CVWD's Supplemental Water Supply Charge (SWSC) program. CVWD and City agreed to cooperate to implement the provisions of the Water Plan MOU.



PO. Box 1058 Coachella, CA 92236
Phone (760) 398-2651 Fax (760) 398-3711

www.cvwd.org



Desert Sands Unified School District

47-950 Dune Palms Road • La Quinta, California 92253 • (760) 771-8515 • FAX: (760) 771-8522

- Facilities Services -

April 15, 2013

City of Coachella
Development Services Department
1515 Sixth Street
Coachella, California 92236

Attention: Mr. Luis Lopez, Development Services Director

**Re: *Notice of Intent to Prepare Draft Environmental Impact Report
for the Coachella General Plan Update – Scoping Meeting***

Dear Mr. Lopez:

Thank you for the above-referenced Notice. On behalf of Desert Sands Unified School District ("District") we are providing the following initial comments regarding the Environmental Impact Report ("EIR") for the Coachella General Plan Update ("Plan") in regard to the Scoping Meeting relating to the above-described matter and Notice. From the available documents describing the Plan, it appears that development within the Plan area will result in a need for the District to provide additional interim and permanent school facilities, as well as central administration and support facilities, to serve students in Kindergarten through Grade 12 relating to such future development in the City of Coachella ("City"). The District looks forward to working collaboratively with the City and the respective developers as the District has done with other developers. The focus of the comments set forth herein is to seek, to identify and quantify possible adverse impacts, both direct and indirect, on the District's school facilities from development within the Plan that need to be addressed in the EIR.

The Coachella General Plan Administrative Draft Environmental Impact Report discusses schools, stating that the District has no new facilities planned and that there is available capacity at the District's schools within the Plan area. However, the Plan projects an increase in population in Coachella from 40,000 to 155,000 by 2035. The District will need new facilities to adequately house the students included in that substantial development, which approximately quadruples the population. More detailed analysis will be provided as information is obtained and reviewed.

Additionally, the District respectfully requests that the City designate and require reservation for the District of school sites within the Plan as needed. The City is permitted to do so in accordance with Government Code Section 65998. We request that they be sufficient to satisfy California Department of Education ("CDE") site selection standards. We will work with the City as to identifying such sites. By requiring reservation of such school sites, the City will ensure that the District can acquire sites that can be approved by CDE and that are in areas that can serve the student population generated by the Plan. In addition, the requested locations also will further the goal of creating a safe and self-contained walking community. Hopefully joint use opportunities also can be realized.

Toward this end, we also look forward to working with the City to ensure that the analysis in the EIR is sufficient to meet the requirements set forth in *Chawanakee Unified School District v County of Madera* (2011) 196 Cal. App. 4th 1016.

We greatly appreciate your attention and consideration of this matter. We believe that it will be in the best interests of both the City and the District to ensure that students generated by the Project are provided with concurrently available, adequate school facilities as such development occurs.

Please do not hesitate to contact the undersigned if you have any questions or comments.

Sincerely,


Patrick Cisneros
Director of Facilities Services 