Draft Initial Study and Mitigated Negative Declaration

Desert Storage Specific Plan

Specific Plan No.: SP 21-1
Development Permit No.: DP 23-5
Environmental Application: ENV 23-4

Applicant:

Strat Property Management
2055 Third Avenue, Suite 200
San Diego, CA 92101

Lead Agency:

City of Desert Hot Springs
65950 Pierson Boulevard
Desert Hot Springs, California 92240

Prepared by:
Terra Nova Planning & Research, Inc.

July 2023

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CHAPTER ONE – INTRODUCTION

1.1 Purpose and Authority

This Initial Study/Mitigated Negative Declaration (IS/MND) has been prepared for the Desert Storage Specific Plan (DSSP) in the City of Desert Hot Springs.

This document is in accordance with the California Environmental Quality Act (CEQA), Public Resources Code Section 21000 et. seq. and the City of Desert Hot Springs will serve as the lead agency pursuant to CEQA.

1.2 Determination

This IS/MND determined that development of the proposed project would not have significant impacts on the environment, with the implementation of mitigation measures wherever applicable.

1.3 California Environmental Quality Act (CEQA) Authority to Prepare a Mitigated Negative Declaration

The City of Desert Hot Springs has prepared this Mitigated Negative Declaration (MND) as the lead agency for the proposed project. This IS/MND is in conformance with California Environmental Quality Act (CEQA) Section 15070, Subsection (a).

The main purpose of the IS/MND is to determine whether there are potentially significant impacts associated with development of the proposed project in the City of Desert Hot Springs.

1.4 Public Review Process

This IS/MND will be circulated for public review to responsible and trustee agencies and interested parties for a period of 20 days. Following the public review and comment process, the City plans to issue a Mitigated Negative Declaration and prepare and file a Notice of Determination (NOD).

CHAPTER TWO – DESCRIPTION OF THE PROJECT SITE

2.1 Project Vicinity

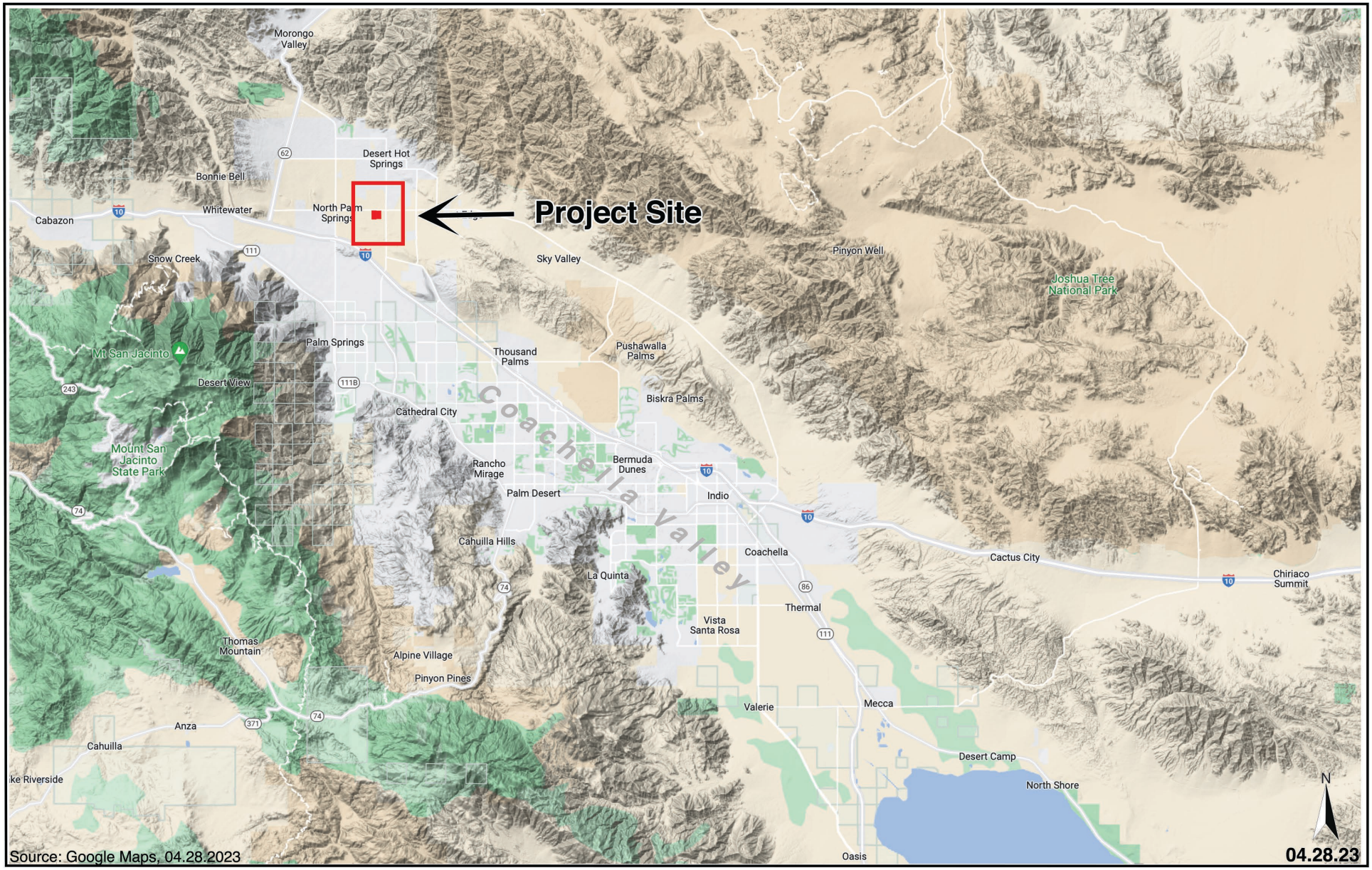
Total Project Area: 9.19

Assessor's Parcel Number: 657-220-003 and -023

Project Location: The project site consists of two parcels and is located on the south side of Dillon Road, west of Palm Drive, east of the dirt extension of Atlantic Avenue, and north of 18th Avenue, in the city of Desert Hot Springs, Riverside County, California

The eastern parcel is fully developed with a self-storage facility, while the western half is currently vacant. The project area is bounded by Dillon Road and vacant lands to the north, a single-family residence to the east, vacant lands to the south, and a commercial plant nursery to the west.

The location of the project site is shown below, in Exhibits 1 and 2.



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Desert Storage Specific Plan Initial Study
Regional Vicinity Map
Desert Hot Springs, California

Exhibit
1

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Desert Storage Specific Plan Initial Study
Project Location Map
Desert Hot Springs, California

Exhibit
2

2.2 Project Description

The proposed Desert Storage Specific Plan (DSSP) establishes the building and development standards within the SP boundaries (project site). The DSSP site is currently designated as Mixed-Use Corridor (MU-C) on the City's General Plan Land Use Map and on the City's Zoning Map. The MU-C designation was designed to provide "higher-intensity, commercially oriented activity," such as commercial retail and professional offices, as well as residential and civic uses.

The DSSP establishes building and development standards for the entire 9.19-acre site. The project site consists of two parcels; the eastern parcel is approximately 4.51 acres and is developed with a mini-storage facility, the western parcel is approximately 4.68 acres and is currently vacant.

The DSSP proposes the development of a recreational vehicle (RV) storage facility with an accompanying caretaker's quarters on the western parcel adjacent to the existing mini-storage facility (see Exhibit 3 Site Plan). The two storage facilities would be linked by an internal pedestrian access point and would share a frontage wall and landscaping to provide a unified frontage.

The environmental impacts resulting from implementation of the proposed DSSP, and development of the RV storage facility have been evaluated in this Initial Study. The following buildout assumptions are made for development of the RV storage facility:

- 4.68 acres site (western parcel);
- 63,600 square foot RV storage lot with 145 RV parking spaces. Assumes 78 covered spaces and 67 uncovered spaces. Consists of asphalt RV parking lot and canopy area;
- 1,492 square foot, single-story caretaker residence;
- 76,583 square feet of hardscape, including internal drives, caretaker and visitor parking (8 parking spaces), sidewalks etc.; and
- 30,320 square feet of landscaping and retention basins.

The project also includes an onsite RV dump station for wastewater and a propane service area. Vehicular access to the project site will be provided through one gated access point on Dillon Road. An internal gated pedestrian access point is proposed between the eastern and western parcels. Perimeter fencing consists of 6-foot-tall block wall with sections of 8-foot-tall tube steel fencing.

Development and Design Standards

The DSSP includes development standards for building height, building setbacks, development density, landscaping and parking. These standards prevail over City of Desert Hot Springs Municipal Code standards, with the Municipal Code standards remaining applicable for all other aspects of development within the Mixed-Use Corridor (MU-C) zoning district.

In addition, the SP establishes Design Guidelines that would serve to guide the aesthetic character and visual quality of future development on the site.

Utilities and Service Providers:

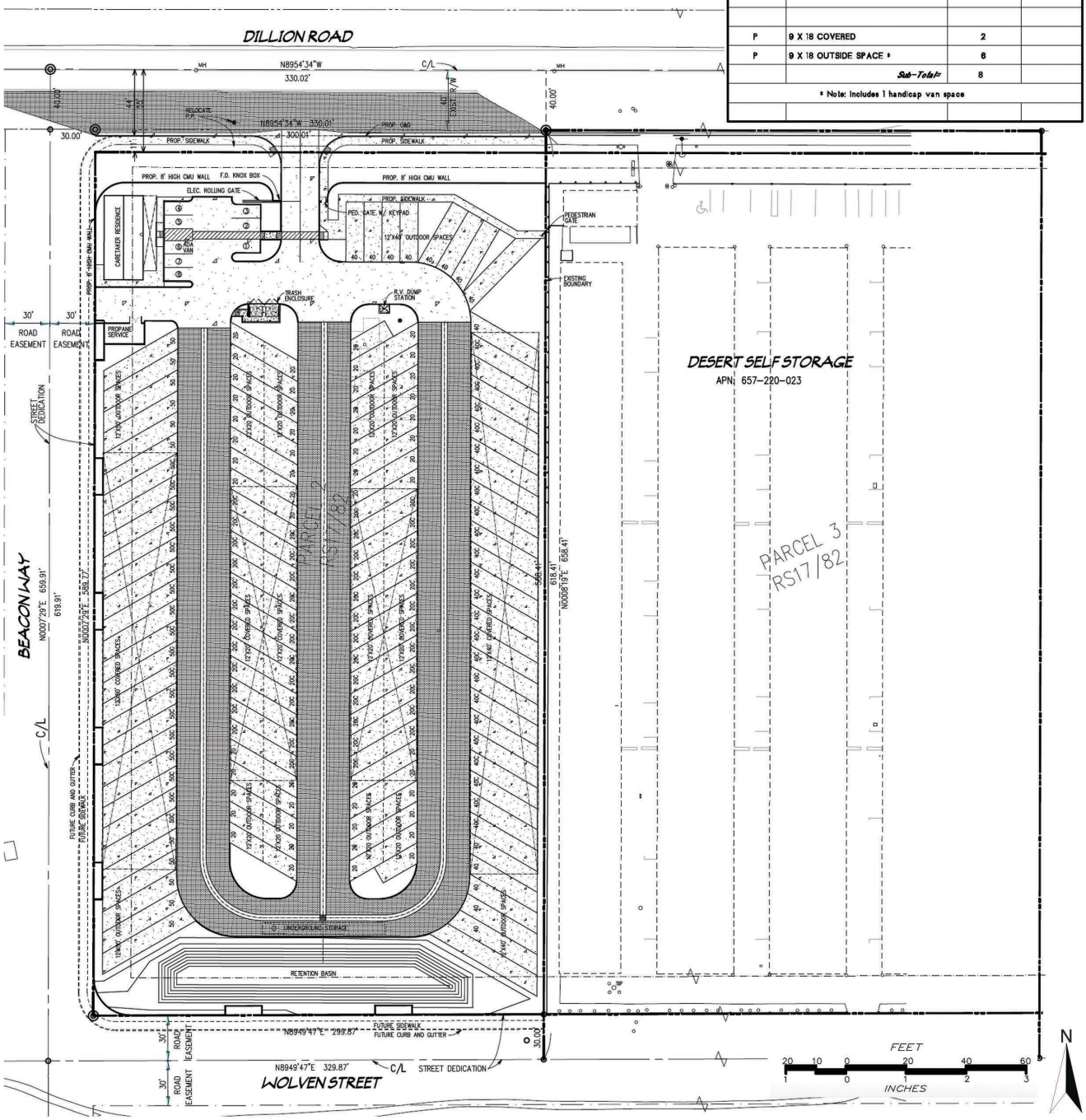
The following utilities will provide service to the project:

1. Sewer: Coachella Valley Water District (CVWD)
2. Water: Coachella Valley Water District (CVWD)
3. Electricity: Southern California Edison (SCE)
4. Gas: Southern California Gas Company
5. Telephone: Frontier
6. Cable: Spectrum

AREA TABULATIONS		
GROSS ACREAGE:	204,072 SF	4.68 AC
WOLVEN ST. DEDICATION	9,897 SF	0.23 AC
BEACON WAY DEDICATION	17,885 SF	0.41 AC
DILLON ROAD DEDICATION	4,495 SF	0.10 AC
NET ACREAGE	171,995 SF	3.95 AC
RESIDENTIAL BUILDING	1,492 SF	0.03 AC
ACCESS ROADS, PARKING, SIDEWALKS, TRASH ENCLOSURE, RV STORAGE AREA	140,183 SF	3.22 AC
LANDSCAPE AREAS AND RETENTION BASIN:	30,320 SF	0.70 AC

PARKING TABULATIONS		
5 PARKING STALL PER 200 STORAGE UNITS	5 STALLS	
2 COVERED PARKING STALLS FOR MANAGER'S RESIDENTIAL UNIT	2 STALLS	
TOTAL PARKING REQUIRED:	7 STALLS	
TOTAL PARKING PROVIDED:	7 STALLS (WITH 1 VAN ACCESSIBLE HANDICAP STALL)	

RV STORAGE BAY TABULATION			
LABEL	UNIT SIZE	#UNITS	%
20	12X20 OUTSIDE SPACE	28	
20C	12 X 20 COVERED	24	
	Sub-Total=	52	36%
40	12 X 40 OUTSIDE SPACE	15	
40C	12 X 40 COVERED	24	
	Sub-Total=	39	27%
50	12 X 50 OUTSIDE SPACE	24	
50C	12 X 50 COVERED	30	
	Sub-Total=	54	37%
	TOTAL ON SITE RV STORAGE:	145	
P	9 X 18 COVERED	2	
P	9 X 18 OUTSIDE SPACE *	6	
	Sub-Total=	8	
* Note: Includes 1 handicap van space			



Source: Sanborn Architectural Group, Inc., 04.18.2023

04.28.23

Exhibit

3

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Desert Storage Specific Plan Initial Study
Project Site Plan
Desert Hot Springs, California

2.3 Mitigation Monitoring Program

Mitigation measures are included where applicable within each section of the initial study checklist and are provided below. The Mitigation Monitoring Program (table below) outlines the potential impacts and mitigation measures of the proposed project and assigns responsibility for the oversight of each mitigation measure. This Table shall be included in all bid documents as a part of the project development.

Table 1
Mitigation Monitoring Program

Section Number	Mitigation Measures	Responsible for Monitoring	Timing	Impact after Mitigation
IV. Biological Resources	**BIO-1** A pre-construction burrowing owl survey following CDFW guidelines[1] must be conducted. Unless avoidable, all burrowing owls must be relocated prior to any ground disturbing activities. If burrowing owls remain on-site, a Burrowing Owl Relocation and Management Plan must be prepared to outline how the owls will be relocated per CDFW guidelines. Any owls occurring on-site must be relocated prior to construction, vegetation removal, or grading activities. Relocation will, at a minimum, require prior approval from the CDFW.[2] **BIO-2** For any grubbing, grading or other site disturbance or tree or vegetation removal occurring during the nesting season between February 1st and August 31st, a qualified biologist shall conduct at least one nesting bird survey, and more if deemed necessary by the consulting biologist, immediately prior to initiation of project-related ground disturbing activities. If nesting birds are present, no work shall be permitted near the nest(s) until the young birds have fledged. While there is no established protocol for nest avoidance, when consulted, the CDFW generally recommends avoidance buffers of	Project Biologist, Planning Department, Building Department.	Prior to the issuance of grading permits.	Less than significant.

1 California Department of Fish and Game (CDFG). 2012. Staff report on Burrowing Owl Mitigation. CDFG, Sacramento, CA.

2 Biological Resources Assessment prepared by Wood Environment & Infrastructure Inc., p.16.

Table 1 Mitigation Monitoring Program				
Section Number	**Mitigation Measures**	**Responsible for Monitoring**	**Timing**	**Impact after Mitigation**
	about 500 feet for birds-of-prey, and 100 – 300 feet for songbirds. If ground disturbance occurs outside the nesting season, this requirement shall be waived. **BIO-3** Development of the project site shall adhere to the CVMSHCP Land Use Adjacency Guidelines, which are briefly described below: • 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. • Toxics: Land uses proposed adjacent to or within a Conservation Area that use chemicals or generate bioproducts 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. • 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.			

Table 1 Mitigation Monitoring Program				
Section Number	**Mitigation Measures**	**Responsible for Monitoring**	**Timing**	**Impact after Mitigation**
	• 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. • 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 Appendix D of the Biological Assessment prepared for the project. • 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. • Grading/Land Development: Manufactured slopes associated with site Development shall not extend into adjacent land in a Conservation Area.			

Table 1 Mitigation Monitoring Program				
Section Number	**Mitigation Measures**	**Responsible for Monitoring**	**Timing**	**Impact after Mitigation**
V. Cultural Resources	**CUL-1** A qualified archeologist and Tribal Cultural Resources monitor shall be on site during pre-construction phases of the project including all earth moving activities, including grubbing, grading, trenching and excavation. If any resource is discovered at the site, the monitor shall identify the resource, and determine whether further investigation is required, or whether earth moving can resume. Any identified resource shall be professionally treated and curated, and included in a post-monitoring report provided to the City and Tribe.	Project archaeologist, Tribal monitor, Planning Department	Report of monitoring provided to City within 30 days of completion of monitoring	Less than significant.
VI. Geology and Soils	**GEO-1** The recommendations contained in LOR Geotechnical Group, Inc. "Preliminary Geotechnical Investigation" dated May 31, 2019, pages 12 through 21, shall be implemented for all grading and construction activities on the project site. The City may require additional project-specific geotechnical engineering analysis, as necessary, to determine whether additional soil remediation or compaction is required.	Project geologist, Planning Department, Building Department.	Prior to the issuance of grading permits.	Less than significant.

CHAPTER THREE – ENVIRONMENTAL CHECKLIST

1. **Project Name:** Desert Storage Specific Plan

2. **Lead Agency Name and Address:**
   City of Desert Hot Springs
   65950 Pierson Boulevard
   Desert Hot Springs, California 92240

3. **Contact Person and Phone Number:**
   Patricia Villagomez, Principal Planner
   760-329-6422 ext. 243

4. **Project Location:** The project site consists of two parcels and is located on the south side of Dillon Road west of Palm Drive, east of the dirt extension of Atlantic Avenue, and north of 18th Avenue, in the city of Desert Hot Springs, Riverside County, California

5. **Project Applicants' Name and Address:**
   Savvas Marinos
   Strat Property Management
   2055 Third Avenue, Suite 200
   San Diego, CA 92101

6. **General Plan Designation:** Mixed-Use Corridor (MU-C)

7. **Zoning Designation:** Mixed-Use Corridor (MU-C)

8. **Description of Project:** Desert Storage Specific Plan establishes development standards and design guidelines for the entire 9.19-acre site. The eastern half of the site is currently developed with a mini-storage (self-storage) facility. The project proposes the development of a recreational vehicle (RV) storage facility with an accompanying caretaker's quarters on the western parcel adjacent to the existing mini-storage facility The two storage facilities would be linked by an internal pedestrian access point and would share a frontage wall and landscaping to provide a unified frontage.

9. **Surrounding Land Uses and Setting**:
   North: vacant lands designated/zoned for Mixed-Use Corridor (MU-C).
   East: one single family residence.
   South: vacant lands designated/zoned for Residential High (R-H).
   West: a commercial plant nursery.

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

    None.

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” or “Less Than Significant with Mitigation Incorporated” as indicated by the checklist on the following pages.

☐ Aesthetics	☐ Agriculture / 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

The City of Desert Hot Springs Planning Department

On the basis of this initial evaluation:

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

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

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

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

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

_____ _____

Patricia Villagomez, Principal Planner Date

I. AESTHETICS Except as provided in Public Resources Code Section 21099, would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Have a substantial adverse effect on a scenic vista?			✓	
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?				✓
c) In nonurbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?			✓	
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?			✓	

Source: Desert Hot Springs General Plan Update, 2020.

Environmental Setting

The project site is in an area surrounded by the Little San Bernardino Mountains to the north and east, San Gorgonio Mountains to the northwest, and San Jacinto Mountains to the south and southwest. These mountain ranges rise to 11,000 feet above the Coachella Valley floor and provide an attractive view. Although some areas of the City no longer have lower views of these mountain ranges due to urban development, the higher elevations views are still available and are of aesthetic value to the City. Therefore, the City enforces ordinances for new developments to ensure that new development in the City does not conflict with any scenic resource programs that may be in place to preserve aesthetic resources.

Discussion of Impacts

a) **Less Than Significant Impact.** A significant impact may occur if the Project introduces incompatible visual elements within a field of view containing a scenic vista or substantially blocks views of a scenic vista. A scenic vista is a viewpoint that provides views of a highly valued landscape for the benefit of the general public. The project site is located in a sparsely urbanized area of Desert Hot Springs that supports a mix of development types, including commercial and residential land uses. The project proposes to develop a single-story RV storage facility on a property which is located approximately 2.8 miles southwest of the Little San Bernardino Mountain foothills.

From the subject property, scenic views of the Little San Bernardino Mountains are to the north and east. Views of the San Jacinto Mountains are to the south and southwest. Views of the San Gorgonio Mountains are to the west, and the north slope of the San Jacinto are visible to the west. Views of the lower elevations of these mountains are blocked by intervening development in all directions. However, middle and upper elevations of the mountains are visible above.

Furthermore, the project site is not located in an area identified as a scenic vista in the City's General Plan.

Lands to the North
Lands immediately to the north of the site are currently vacant and are designated and zoned as Mixed-Use Corridor (MU-C). Therefore, no viewers would be impacted by the project.

Lands to the East
Lands immediately to the east of the DSSP site are developed with a single-story, single-family residence, which partially blocks views of the lower elevations of the Little San Bernardino Mountain foothills to the east. However, middle and upper elevations of the mountain is still visible above. For viewers east of the project site, the existing on-site mini-storage facility partially blocks western views of the lower elevations of the San Gorgonio and San Jacinto Mountain ranges. Views to the west from the single-family residence will not be affected by the proposed RV storage facility because the existing mini-storage facility partially blocks views.

Lands to the West
Lands immediately to the west are developed as a commercial plant nursery, which partially blocks views of the lower elevations of the San Gorgonio and San Jacinto Mountain ranges. However, middle and upper elevations of the mountains are still visible above. For viewers from the west, views of the Little San Bernardino foothills are currently blocked by the on-site mini-storage facility. The addition of the proposed project will marginally increase view blockage, but views of the upper reaches of the range will remain.

Lands to the South
Lands immediately to the south of the site are currently vacant and designated and zoned as Residential High (R-H). Future viewers to the south will have views of the Little San Bernardino Mountain foothills partially blocked by the proposed project. However, upper and middle elevations of the mountains will still be visible above.

For these reasons, the project's overall impacts to scenic vistas would be less than significant.

b) **No Impact.** There are no scenic resources, such as, trees, rock outcroppings or historic buildings at the site, nor is Dillon Road designated a scenic highway. Therefore, no impact is anticipated.

c) **Less Than Significant Impact.** The project site is located in the central portion of the City which is predominantly occupied by urban-scaled development and vacant lands. The DSSP site currently consists of a mini-storage facility and vacant lands. Implementation of the project will be similar in character to the existing mini-storage facility on-site and other nearby commercial developments in the City. The mass and height of the on-site buildings and structures would be similar in height to nearby residential and commercial structures to the east and west, respectively. Also, the project includes frontage improvements on both parcels to create a uniform aesthetic design.

The DSSP includes development standards and guidelines that require quality construction and a coordinated architectural style. Therefore, impacts associated with visual character are expected to be less than significant.

d) **Less Than Significant Impact.** The project is located in a partially urbanized environment that includes existing sources of light and glare associated with nearby land uses. Nearby sources of light include exterior lighting on commercial and residential buildings and passing vehicle headlights on Dillon Road. Currently, the DSSP site is partially developed with a mini-storage facility with existing sources of exterior lighting. The site of the proposed RV storage facility is currently vacant and has no existing sources of light.

The proposed project would result in a new caretaker building and RV parking area, both of which may result in an increase of artificial light and glare into the existing environment. Potential sources of light and glare would include external building lighting, parking lot lighting, an illuminated sign, security lighting, building windows, and reflective building materials which would contribute to nighttime light pollution and result in impacts to nighttime views in the area. However, these light sources will be blended with the existing surrounding light and glare sources without adversely affecting day or nighttime views.

The SP does not allow the use of highly reflective materials in the architectural design. The project's lighting will be required to comply with §17.40.170 of the Municipal Code. Per the City's requirements, lighting must be fully or partially shielded in order to prevent glare and light spread beyond the site boundaries. In accordance with the City's Mixed-Use development standards, per §17.14.040, lighting shall be incorporated along sidewalks and pedestrian walkways.

Overall, the project impacts would be less than significant.

Mitigation Measures:
None required.

Monitoring:
None required.

II. AGRICULTURAL 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 Department 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 the information compiled by the California Department of Forestry and Fire Protection regarding the State's inventory of forest land, including the Forest Legacy Assessment Project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board.	**Potentially Significant Impact**	**Less Than Significant with Mitigation Incorporated**	**Less Than Significant Impact**	**No Impact**
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 by Public Resource Code section 122220(g)), timberland (as defined by Public Resource 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 exiting 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?				✓

Source: Desert Hot Springs General Plan Update, 2020; "Riverside County Important Farmland 2016 Map," sheet 2 of 3, California Department of Conservation; City's Land Use Map.

Environmental Setting

The project site is designated and zoned as Mixed-Use Corridor (MU-C). Adjacent properties to the north, east, and west are designated and zoned as Mixed-Use Corridor (MU-C). Lands to the south of the Project site are designated and zoned as Residential High (R-H). The site to the northwest of the Project is designated and zoned as Open Space (OS). No agricultural land use designations occur in the project site vicinity.

Discussion of Impacts

a-e) No Impact.

Prime Farmland: The project site is not located within or close to any prime or unique farmland, or farmland of statewide importance. Therefore, no impact to state-designated agricultural land would occur.

Williamson Act: The project site is not under Williamson Act contract; therefore, no impact is anticipated.

Forest Land: No forest lands and timberland exist on the project site or within the vicinity of the project site. Therefore, no impact is anticipated.

Mitigation Measures:
None required.

Monitoring:
None required.

III. AIR QUALITY Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. **Would the project:**	**Potentially Significant Impact**	**Less Than Significant with Mitigation Incorporated**	**Less Than Significant Impact**	**No Impact**
a) Conflict with or obstruct implementation of the applicable air quality plan?				✓
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?			✓	
c) Expose sensitive receptors to substantial pollutant concentrations?			✓	
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?			✓	

Source: Desert Hot Springs General Plan Update, 2020; 2022 South Coast AQMP; "Final Localized Significance Threshold Methodology," prepared by the South Coast Air Quality Management District, Revised, July 2008; "2003 Coachella Valley PM_{10} State Implementation Plan," August 1, 2003; CalEEMod Version 2020.4.0

Environmental Setting

The City of Desert Hot Springs, including the project site is located in the Salton Sea Air Basin (SSAB), which is under the jurisdiction of the South Coast Air Quality Management District (SCAQMD). The SCAQMD is one of the 35 air quality regulatory agencies in the State of California and all development within the SSAB is subject to SCAQMD's 2022 Air Quality Management Plan (2022 AQMP) and the 2003 Coachella Valley PM_{10} State Implementation Plan (2003 CV PM_{10} SIP). The SCAQMD operates and maintains regional air quality monitoring stations at numerous locations throughout its jurisdiction. The project site is located within Source Receptor Area 30 (SRA 30) which includes monitoring stations in Palm Springs, Indio and Mecca.

Criteria air pollutants are contaminants for which state and federal air quality standards (i.e. California Ambient Air Quality Standards (CAAQS) and National Ambient Air Quality Standards (NAAQS)) have been established. The SSAB exceeds state and federal standards for fugitive dust (PM_{10}) and ozone (O_3), and is in attainment/unclassified for $PM_{2.5}$. Ambient air quality in the SSAB, including the project site, does not exceed state and federal standards for carbon monoxide, nitrogen dioxides, sulfur dioxide, lead, sulfates, hydrogen sulfide, or vinyl chloride.

The SSAB continues to exceed federal and state standards for ozone and PM_{10}. In order to achieve attainment in the region, the 2003 Coachella Valley PM_{10} Management Plan was adopted, which established strict standards for dust management for development proposals.

Discussion of Impacts

a) **No Impact.** A significant air quality impact could occur if the proposed project is not consistent with the applicable Air Quality Management Plan (AQMP) or would obstruct the implementation of the policies or hinder reaching the goals of that plan.

As described above, the project site is located within the SSAB and is subject to SCAQMD's 2022 AQMP and the 2003 CV PM_{10} SIP. The AQMP is a comprehensive plan that establishes control strategies and guidance on regional emission reductions for air pollutants. The AQMP is based, in part, on the land use plans of the jurisdictions in the region. As discussed under Section X, Land Use and Planning, the proposed project is consistent with the land use designation applied to it in the General Plan, and will result in the development of a RV storage facility which can be expected to generate emissions consistent with those anticipated in the 2022 AQMP.

The SCAQMD works directly with the Southern California Association of Governments (SCAG), county transportation commissions, and local governments, and cooperates actively with all State and federal government agencies. The project would not result in any permanent population inconsistent with the City's land use designations. Therefore, the proposed project will be consistent with the intent of the AQMP and will not conflict with or obstruct implementation of the applicable air quality plan. No impact is anticipated.

b) **Less Than Significant Impact.** A project is considered to have significant impacts if there is a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or state ambient air quality standard. The SSAB is a nonattainment area for PM_{10} and Ozone. Therefore, if the Project's construction and/or operational emissions exceed SCAQMD thresholds for PM_{10} and ozone precursors, which include carbon monoxide (CO), nitrous oxides (NOx), and volatile/reactive organic compounds/gases (VOC or ROG), then impacts would be cumulatively considerable and significant.

The air quality emissions to be generated by the proposed project were projected using the California Emissions Estimator Model (CalEEMod) Version 2020.4.0 (Appendix A). The proposed Project will release criteria air contaminants during the construction and operation phases, as shown in Tables 2 and 3, respectively. Table 2 summarizes short-term construction-related emissions, and Table 3 summarizes ongoing emissions generated during operation.

Construction Impacts

For analysis purposes, it is assumed that construction of the entire Project would occur over a 5-month period. Construction-related criteria pollutant emissions will be temporary and will end once construction is complete.

Project would result in approximately 4.68-acres of disturbance, a 1,492 square foot caretaker residence, and 3.22 acres of paving. According to preliminary grading plans it was assumed that soil materials would balance on-site. The construction period includes site preparation, grading, paving, building construction, and application of architectural coatings.

Table 2
Maximum Daily Construction-Related Emissions Summary (pounds per day)

Construction Emissions	CO	NO_x	ROG	SO_2	PM_{10}	$PM_{2.5}$
Daily Maximum	18.88	27.56	9.15	0.03	10.26	5.75
SCAQMD Thresholds	550.00	100.00	75.00	150.00	150.00	55.00
Exceeds?	No	No	No	No	No	No

As shown in Table 2, emissions generated by construction activities will not exceed SCAQMD thresholds for any criteria pollutant. Applicable standard requirements and best management

practices include, but are not limited to, the implementation of a dust control and management plan in conformance with SCQAMD Rule 403, proper maintenance and limited idling of heavy equipment, phasing application of architectural coatings and the use of low-polluting architectural paint and coatings. Construction related impacts are considered less than significant.

Operational Emissions

Operational air quality impacts would include emissions from project-generated vehicle traffic and facility operations, including energy usage and landscape maintenance equipment.

To estimate the Project's trip generation, the Project traffic analysis applied trip generation rates for Mini-Warehouse (land use code 151) and Single-Family Detached Housing (land use code 210), as provided by the Institute of Transportation Engineers (ITE) in its Trip Generation Manual 11th Edition, to the Project. Based on these rates, the Project is estimated to generate approximately 37 new trips per day. Table 3 provides a summary of projected emissions during operation of the proposed project.

Table 3
Maximum Daily Operational-Related Emissions Summary
(pounds per day)

Operational Emissions	**CO**	**NO_x**	**ROG**	**SO_2**	**PM_{10}**	**$PM_{2.5}$**
Daily Maximum	1.00	0.13	0.23	0.00	0.17	0.04
SCAQMD Thresholds	550.00	100.00	75.00	150.00	150.00	55.00
Exceeds?	No	No	No	No	No	No

As Table 3 shows, operational emissions will not exceed SCAQMD thresholds of significance for any criteria pollutants for operations. Impacts related to the operation of the proposed project will be less than significant.

The Coachella Valley is classified as a non-attainment area for PM_{10} and ozone. Although the proposed project will contribute to an incremental increase in regional PM_{10} and ozone emissions, significance thresholds would not be surpassed during either construction and operation of the project. Due to its limited size and scope, and the implementation of standard requirements, including the City's requirement for dust management plans, overall cumulative impacts are not expected to be significant for PM_{10} or ozone precursors (NOx and CO). The project will result in less than significant impacts.

Summary:

The construction and operation of the proposed project will result in criteria emissions that are well within the SCAQMD significance thresholds, and would not violate any air quality standard or contribute substantially to an existing or projected air quality violation. Overall, impacts related to construction and operation will be less than significant.

c) **Less Than Significant Impact.** The nearest sensitive receptors are single-family residence located within 100 meters east of the RV storage facility site. To determine if the proposed project has the potential to generate significant adverse localized air quality impacts, the mass rate Localized Significance Threshold (LST) Look-Up Table was used. The City of Desert Hot Springs and the project property are located within Source Receptor Area 30 (Palm Spring, Indio, and Mecca/Coachella Valley).

The 5-acre site tables at a distance of 100 meters were used for analysis, based on the project's size and proximity to existing housing. Table 4 shows on-site emission concentrations for project construction and operations and the associated LST.

Table 4 Localized Significance Threshold Emissions (pounds per day)				
	CO	**NOx**	**PM_{10}**	**$PM_{2.5}$**
Construction	18.88	27.56	10.26	5.75
LST Threshold	5,331	425	67	19
Exceed?	**No**	**No**	**No**	**No**
Operation	1.00	0.13	0.17	0.04
LST Threshold	5,331	425	16	5
Exceed?	**No**	**No**	**No**	**No**
LST Threshold Source: LST Mass Rate Look-up Table, SCAQMD.				

As shown above, the construction and operational emissions of criteria pollutants would be limited and LST thresholds will not be exceeded. For this reason, impacts to nearby sensitive receptors during construction and operations will be less than significant.

Health Impacts

Tables 2 and 3 indicate that the construction and operational phases of the proposed project will yield criteria emissions below the SCAQMD significance thresholds. It is not scientifically possible with today's technologies to calculate the degree to which exposure to various levels of criteria pollutant emissions will impact the health of an individual. The effects of criteria pollutants are not experienced equally by everyone, the dispersing nature of pollutants makes the exact locations of impacts difficult to predict, and there are currently no approved methodologies or studios upon which to base assumptions. As such, the extent to which the proposed project poses a health risk is uncertain but unavoidable. It is anticipated that impacts associated with criteria pollutants and related health effects will overall be less than significant.

d) **Less Than Significant Impact.** Offensive odors rarely cause any physical harm; however, they still can be very unpleasant, leading to distress among the public and often generating citizen complaints to local governments and regulatory agencies. Odor impacts on residential areas and other sensitive receptors, such as daycare centers and schools, are of particular concern.

Some land uses can be sources of odors that, while not necessarily physically harmful, may be unpleasant and distressing to the public. The SCAQMD identifies land uses such as agriculture, chemical plants, composting operations, dairies, fiberglass molding, landfills, refineries, rendering plants, rail yards, and wastewater treatment plants, as more likely to generate odors. The Project proposes the development of RV storage and residential uses which may produce some odors from landscaping and maintenance activities but are not likely to produce any objectionable odors long term. While some odors may be generated on-site during construction, their production will be short term and, even while ongoing, they are expected to disperse quickly with distance from the construction site. Impacts from objectionable odors are thus anticipated to be less than significant.

Mitigation Measures:
None required.

Monitoring:
None required.

IV. BIOLOGICAL RESOURCES Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?		✓		
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?				✓
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?				✓
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?			✓	
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?		✓		
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?		✓		

Source: Desert Hot Springs General Plan Update, 2020; "Desert RV Storage Site Project" Biological Resources Assessment, prepared by Wood Environment & Infrastructure, Inc. December 2, 2022; "Coachella Valley Multiple Species Habitat Conservation Plan," 2007.

Environmental Setting

The project site located in the Coachella Valley where the climate and natural topography offer unique habitats and diverse plant communities and wildlife. The City of Desert Hot Springs contains a wide range of significant biological resources, many of which are species of plants and animals that are highly specialized and endemic to the Valley.

The site of the proposed RV storage facility is currently vacant with areas of cleared, bare ground, a cement pad indicating the former presence of a structure, and fairly extensive trash dumping throughout the site.

The Coachella Valley Multiple Species Conservation Plan (CVMSHCP) is a comprehensive regional plan that balances growth in the Coachella Valley with the requirements of federal and State endangered species

laws. The entire Project site is within the boundaries of and subject to the provisions of the CVMSHCP,[3] but is not located within a CVMSHCP Conservation Area. However, the southwestern corner of the project site is located immediately adjacent to the Willow Hole Conservation Area, and the southern edge of the Upper Mission Creek/Big Morongo Canyon Conservation Area is located on the north side of Dillon Road across from the project site.[4] The City is a permittee under the Coachella Valley Multiple Species Conservation Plan (CVMSHCP), therefore, all new developments within it are subject to CVMSHCP provisions.

Discussion of Impacts

a) **Less Than Significant Impact with Mitigation Incorporated.** The site of the RV storage facility is currently vacant and sparsely covered by native plant species, such as plants associated with Creosote bush.

A biological resources assessment identified 63 special status biological resources which occur or potentially occur on the project site and greater project vicinity (4 to 5-mile radius). As part of the assessment, a biological field assessment of the site was conducted on October 28, 2022. No special status species were observed on-site during the assessment. No species listed as threatened or endangered, or designated as California Species of Special Concern (CSC) by the CDFW were observed on the site.

Sensitive Plant Species
Only one of the 29 sensitive plant species known from the greater project vicinity (based on CNDDB records within a five-mile radius of the project site) are expected to have any occurrence probability on the site. Coachella Valley milk-vetch (Astragalus lentiginosus var. coachellae) would have a low probability of occurring on the site due to the degraded nature of the site and low-quality habitat present. Coachella Valley milk-vetch is a covered species under the CVMSHCP and payment of the required CVMSHCP development fee will mitigate any potential impacts to this species. There are no special status species of vegetation communities were identified on the project site.

Sensitive Wildlife Species
Of the 31 sensitive wildlife species that have the potential to occur in the project vicinity only five (5) are thought to have low potential to forage over the project site or in the immediate area, with one sensitive wildlife species detected immediately adjacent to the site. Four of the species are birds and include: golden eagle (Aquila chrysaetos), prairie falcon (Falco mexicanus), black-tailed gnatcatcher (Polioptila melanura), and burrowing owl (Athene cunicularia). It should be noted that none are expected to nest on or adjacent to the project site due to a lack of suitable habitat. No burrows or appropriate manmade structures capable of supporting burrowing owls were observed on the site. No burrowing owls or their sign were observed on the site. There is a low probability that western yellow bat could forage over the site and could potentially roost in some of the remnant landscape palms remaining on the site, although these palms are small and in poor condition.

Burrowing Owl
No burrows suitable for burrowing owl use were observed on or adjacent to the project site. There is, however, a low potential for the species to locate on the site prior to initiation of construction. The burrowing owl is managed as a Bird of Concern (BCC) by the U.S. Fish and Wildlife Service (USFWS) and designated as a Species of Concern (CSC) by the California Department of Fish and Wildlife (CDFW). It is also protected from take by the Migratory Bird Treaty Act (MBTA), California Fish and Game Code, and under the CVMSHCP. All burrowing owls must be avoided or relocated prior to any ground disturbing activities. To assure that this impact is mitigated, Mitigation Measure BIO-1 is provided below,

3 Recirculated Final Coachella Valley Multiple Species Habitat Conservation Plan; Figure 8-3

4 Biological Resources Assessment prepared by Wood Environment & Infrastructure Inc., p.6

which requires pre-construction surveys to assure that the species is not present, or to protect the species should it be identified on-site. With implementation of this mitigation measure, impacts to burrowing owls will be less than significant.

Nesting Birds

The existing vegetation on the Project site would have a low potential to provide nesting opportunities for birds covered under the Migratory Bird Treaty Act (MBTA). As the subject site is vacant, these species could reside seasonally within the subject site. Nesting activities could occur between January and August of any year. Under the provisions of the MBTA, impacts to covered nesting birds would be considered a significant impact. To assure that impacts to bird nests covered under the MBTA are reduced to less than significant levels, a pre-construction survey is required if any activity to remove vegetation is proposed during the nesting season (February 1 to August 31), as provided in Mitigation Measure BIO-2, below. With implementation of this mitigation measure, impacts to birds covered by the MBTA will be less than significant.

b, c) **No Impact.** No streams, riparian habitat, marshes, protected wetlands, vernal pools or sensitive natural communities protected by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service are reported at the site, therefore, no project-related impact is anticipated.

d) **Less than Significant Impact.** The project site is located in a partially urbanized setting which has been influenced by human activity for many decades and is surrounded on three sides by development (roadways and structures). There are no wildlife corridors or biological linkages mapped on or adjacent to the project site. Therefore, development of the site will not interfere substantially with the movement of any native resident or migratory species. The site is not known to be a native wildlife nursery site; however, the Project could result in potential impacts to nesting birds, as discussed in a) above. Impacts will be less than significant.

e, f) **Less Than Significant with Mitigation Incorporated.** The site is not within a CVMSHCP-designated Conservation Area. However, the site is adjacent to the Willow Hole Conservation Area, and across the street from the Upper Mission Creek/Big Morongo Canyon Conservation Area. Development of the site will adhere to the CVMSHCP Land Use Adjacency Guidelines (Mitigation Measures BIO-3) that are intended to avoid or minimize indirect effects from Development adjacent to or within the Conservation Areas. In addition, as the site is within the CVMSHCP jurisdiction, the project is subject to payment of the Development Mitigation Fee. This standard requirement will assure that potential impacts to covered species are less than significant.

The project will not conflict with any policies or ordinances that protect biological species, or any habitat conservation plans or natural community conservation plans. Impacts are expected to be less than significant with payment of the CVMSHCP Development Mitigation Fee and adherence to the Land Use Adjacency Guidelines.

Mitigation Measures:

BIO-1 A pre-construction burrowing owl survey following CDFW guidelines[5] must be conducted. Unless avoidable, all burrowing owls must be relocated prior to any ground disturbing activities. If burrowing owls remain on-site, a Burrowing Owl Relocation and Management Plan must be prepared to outline how the owls will be relocated per CDFW guidelines. Any owls occurring on-site must be relocated prior to construction, vegetation removal, or grading activities. Relocation will, at a minimum, require prior approval from the CDFW.[6]

BIO-2 For any grubbing, grading or other site disturbance or tree or vegetation removal occurring during the nesting season between February 1st and August 31st, a qualified biologist shall conduct at least one nesting bird survey, and more if deemed necessary by the consulting biologist, immediately prior to initiation of project-related ground disturbing activities. If nesting birds are present, no work shall be permitted near the nest(s) until the young birds have fledged. While there is no established protocol for nest avoidance, when consulted, the CDFW generally recommends avoidance buffers of about 500 feet for birds-of-prey, and 100 – 300 feet for songbirds. If ground disturbance occurs outside the nesting season, this requirement shall be waived.

BIO-3 Development of the project site shall adhere to the CVMSHCP Land Use Adjacency Guidelines, which are briefly described below:

- 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.
- Toxics: Land uses proposed adjacent to or within a Conservation Area that use chemicals or generate bioproducts 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.
- 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.
- 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.
- 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 Appendix D of the Biological Assessment prepared for the project.
- 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.
- Grading/Land Development: Manufactured slopes associated with site Development shall not extend into adjacent land in a Conservation Area.

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5 California Department of Fish and Game (CDFG). 2012. Staff report on Burrowing Owl Mitigation. CDFG, Sacramento, CA.

6 Biological Resources Assessment prepared by Wood Environment & Infrastructure Inc., p.16.

Monitoring:

BIO-A Prior to the issuance of any permit to allow ground disturbance on the site, the project Applicant shall provide the City with pre-construction surveys for burrowing owl and MBTA covered birds, if applicable.

BIO-B Prior to the issuance of any permit to allow ground disturbance on the site, the project Applicant shall provide the City with confirmation that CVMSHCP Land Use Adjacency Guidelines were adhered to.

V. CULTURAL RESOURCES Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Cause a substantial adverse change in the significance of a historical resource pursuant to in §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?				✓

Source: Desert Hot Springs General Plan Update, 2020. "Historical/Archaeological Resources Survey Report for Desert RV Storage Project," prepared by CRM TECH on January 29, 2023.

Environmental Setting

The oldest cultural resources reported in the City of Desert Hot Springs are from the "Paleo-Indian Period" which dates back to at least 11,000 B.C. There is a high probability that prehistoric resources will occur in the vicinity of fault-related mesquite and palms, as well as resources associated with mountain washes, streams and canyons. Mesquite thickets that generally occur in dune areas are another high probability category since mesquite and screwbean pods were staples in the diet of the region's Cahuilla Indians. The project site occurs in the urban core of the City, and is not adjacent to these high-probability areas.

According to the City's General Plan, the Cahuilla Indians are the first known human inhabitants of the Coachella Valley who were a Takic-speaking people. Cahuilla Indians are generally divided into three groups based on their geographic setting: the Pass Cahuilla of the Beaumont/Banning area; the Mountain Cahuilla of the San Jacinto and Santa Rosa Mountains; and the Desert Cahuilla from the Coachella Valley, as far south as the Salton Sea.

Section 15064.5 of the CEQA Guidelines generally defines a historic resource as a resource that is: (1) listed in, or determined to be eligible for listing in the California Register of Historical Resources (California Register); (2) included in a local register of historical resources (pursuant Section 5020.1(k) of the Public Resources Code); or (3) identified as significant in an historical resources survey (meeting the criteria in Section 5024.1(g) of the Public Resources Code). A resource may be listed in the California Register if it is (1) associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage; (2) is associated with the lives of persons important in our past; (3) embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; (4) has yielded, or may be likely to yield, information important in prehistory or history.[7]

[7] California Public Resources Code 5024.1.

Discussion of Impacts

a, b) **No Impact; Less Than Significant Impact with Mitigation Incorporated.** CRM TECH prepared a Historical/Archaeological Resources Survey Report for the subject site in January 2023. The report included references to comprehensive records searches for adjacent properties provided by the Eastern Information Center (EIC) of the University of California, Riverside. In addition, CRM TECH conducted independent historical research, consultation with Native American representatives, and an on-site field survey.

Eastern Information Center (EIC) Records Search

According to EIC records, the project area had not been surveyed systematically for cultural resources prior to the report. Within the one-mile radius of the project site, records from the EIC identify 20 additional studies completed on various tracts of land and linear features between 1991 and 2017, and nine other historical/archaeological resources, including seven sites and two isolates (i.e., localities with fewer than three artifacts). All seven sites dated to the historic period, while both of the isolates were prehistoric (i.e., Native American) in origin. Among the sites were roadways, buildings, structural remains, and scattered refuse items, and the isolates consisted of a ceramic sherd and a groundstone fragment. Only one these localities (Dillon Road) were found in the immediate vicinity of the project area. Therefore, they require no further consideration.

Native American Consultation

On October 24, 2022, CRM TECH submitted a written request to the State of California Native American Heritage Commission (NAHC) for a Sacred Lands File records search, as well as requests for information about tribal cultural resources to the nearby Agua Caliente Band of Cahuilla Indians.

The NAHC reported in a letter dated November 28, 2022, that the Sacred Lands File identified unspecified Native American cultural resource(s) in the project vicinity and recommended contacting the Agua Caliente Band of Cahuilla Indians for further information. On November 30, 2022, the tribe notified CRM TECH that they did not have personnel available to participate in the archaeological fieldwork and requested to be informed of the results of the survey. On December 6, a brief summary of the findings was sent to the tribe via electronic mail. Subsequently, the tribe provided CRM TECH with a formal response to the inquiry on December 8, in which they requested copies of all cultural resources documentation generated for the project and Native American monitoring during ground-disturbing activities in the project area (Mitigation Measures CUL-1).

In addition to the consultation undertaken by CRM Tech, the city is conducting Tribal Consultation, in conformance with the requirements of AB 52 and SB 18. This process, and the results of the process, are described in Section XVIII, Tribal Cultural Resources.

Historical Background Research

Results of the Historical/Archeological study suggest that the project area is relatively low in sensitivity for cultural resources from the historic period. In the 1940s-1950s, Dillon Road was the only notable feature in the immediate vicinity of the project area. By 1972, a group of buildings had appeared on the site planned for the RV storage facility, but were removed sometime before 2002, leaving only foundational remains visible by that year. Since then, no major changes in land use have been observed on the property.

Field Survey

A field survey was conducted on December 1, 2022. No “historic resources,” buildings, structures, objects, features or substantial prehistoric or historic artifacts were found during the field survey. Two concrete slab foundations were noted where the previous buildings stood in the 1970s-1980s, along with an abandoned well and a few scattered refuse items. Dating only to the late historic period (1950s-1970s), these minor, fragmented, and ubiquitous remains demonstrate no potential for historic significance. The removal of the buildings has effectively severed any association that the

property may have had with persons or events in its history, and the small cluster of common refuse items holds little promise for any important archaeological data. As such, the remains of the buildings are not considered potential "historical resources" under CEQA and require no further study.

Summary

Neither the EIC records search, Native American consultant, historical background research, or field survey found any evidence of historical resources on the project site. The location of the Project also indicated a low sensitivity for significant prehistorical archeological deposits.

Nonetheless, to protect the potential archaeological resources under the site and reduce potential impacts to less than significant levels, Mitigation Measure CUL-1 is included at the end of this section, consistent with the findings of the Historical/Archeological investigation. With the implementation of this mitigation measure, potential impacts associated with archaeological resources will be reduced to less than significant levels.

c) **No Impact.** No human remains were found on the surface of the site. However, if any remains are revealed during grading, State law requires that construction activities must be halted, and the Riverside County Coroner must be contacted immediately to determine the origin of the remains prior to continuing the construction. Since there is very low probability for such discovery, no impact is expected for the project.

Mitigation Measures:

CUL-1 A qualified archeologist and ACBCI Tribal Cultural Resources monitor shall be on site during pre-construction phases of the project including all earth moving activities, including grubbing, grading, trenching and excavation. If any resource is discovered at the site, the monitor shall identify the resource, and determine whether further investigation is required, or whether earth moving can resume. Any identified resource shall be professionally treated and curated, and included in a post-monitoring report provided to the City and Tribe.

Monitoring:

CUL-A The project archaeologist and/or Tribal monitor shall prepare a report documenting monitoring activities. The monitoring report shall be submitted to the City within 30 days of completion of grading activities.
Responsible parties: Project proponent, project archaeologist, Planning Department.

VI. ENERGY Would the Project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during Project construction or operation?			✓	
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?				✓

Sources: Desert Hot Springs General Plan Update 2020; SoCalGas Aspire 2045 – Sustainability Strategy.

Environmental Setting

Natural gas and electricity to the Project site are provided by Southern California Gas Company (SoCalGas) and Southern California Edison (SCE), respectively. The Project site is currently undeveloped, and utilities will be extended to it as part of the Project's development.

Discussion of Impacts

a) **Less Than Significant Impact**. The proposed project consists of the construction and operation of a RV storage facility, including onsite caretaker residence. The proposed buildings would be built to current Building Code standards, including the installation of insulation and high efficiency HVAC systems.

Project construction would result in short-term consumption of energy resources for operation of construction equipment and manufacturing of construction materials; however, energy use would be limited due to the relatively small scale of the Project (<5 acres). Compliance with local, state, and federal regulations (e.g., limit engine idling times, require the recycling of construction debris, etc.) would reduce short-term energy consumption during construction to the extent feasible, and Project construction would not result in a wasteful or inefficient use of energy.

Long-term operation of the Project would not result in unusual site characteristics or processes that would require the use of equipment that would be more energy intensive than is used for comparable land uses, or the use of equipment that would not conform to current emissions standards and related fuel efficiencies.

The project is estimated to generate 37 trips per day (see Section XVII, Transportation) of a standard personal and recreational vehicle mix, which will not result in unusually high fuel consumption. Through compliance with applicable requirements, including the California Code of Regulations Title 24, Part 6–Energy Efficiency Standards, as well as the City's Climate Action Plan (CAP) discussed below, individual Project elements (e.g., building design, HVAC equipment, etc.) would be consistent with state and local energy reduction policies and strategies and would not consume energy resources in a wasteful or inefficient manner. Impacts on energy resources will be less than significant.

b) **No Impact.** State and local agencies regulate the use and consumption of energy through various methods and programs (e.g., Assembly Bill 32, California Code of Regulations Title 24, Part 6–Energy Efficiency Standards, and the California Code of Regulations Title 24, Part 11– California Green Building Standards (CALGreen). Per the latest (2019) CALGreen requirements for non-residential construction, the Project buildings will be constructed to be ready for zero-net-energy (ZNE) by 2030.

At the local level, the City's Building Division and Code Compliance Departments enforce the applicable requirements of the Energy Efficiency Standards and Green Building Standards in Title 24. In addition, the City's 2020 General Plan Update and 2013 Climate Action Plan identify specific strategies and measures for energy conservation within the City. The Project would be required to comply with City policies and programs regarding energy efficiency.

No impact related to compliance with applicable energy standards would result because the proposed Project would not conflict with or obstruct State or local plans for renewable energy or energy efficiency.

Mitigation Measures: None required.

Monitoring: None required.

VII. GEOLOGY AND SOILS Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.				✓
ii) Strong seismic ground shaking?			✓	
iii) Seismic-related ground failure, including liquefaction?				✓
iv) Landslides?				✓
b) Result in substantial soil erosion or the loss of topsoil?			✓	
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?		✓		
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?				✓
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?				✓
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?				✓

Source: Desert Hot Springs General Plan Update, 2020; Preliminary Geotechnical Investigation Proposed Storage Center, prepared by LOR Geotechnical Group, Inc. May 31, 2019.

Environmental Setting

Regional Geologic and Tectonic Setting

Tectonically, the Coachella Valley is located between two faults zones: the San Andreas Fault Zone and San Jacinto Fault Zone. These fault zones form mountains around the valley. The valley is bounded by the Little San Bernardino Mountain Range on the north and east, Santa Rosa and San Jacinto Mountain Ranges on the west and southwest, and San Gorgonio Mountains to the northwest. The Salton Sea is located at the end of the trough, to the southeast.

The valley's geologic composition and seismicity are directly related to the San Andreas and San Jacinto fault zones. Both these zones are active fault zones exposing the valley to a range of geologic hazards, including ground rupture, major ground shaking, slope instability, and collapsible and expansive soils.

Episodic flooding of major regional drainages, including the Morongo Wash and Whitewater River, results in the deposition of sand and gravel on the valley floor. Strong sustained winds emanating from the San Gorgonio Pass cause wind erosion and transport and deposit dry, finely granulated, sandy soils on the central valley floor.

Regional soils range from rocky outcrops within the mountains bordering the valley to coarse gravels of mountain canyons and recently laid fine- and medium-grained alluvial (stream deposited) and aeolian (wind deposited) sediments on the central valley floor.

Soil Conditions

The surface soil at the site is predominantly imported fill materials overlying native alluvial soils. The majority of the fill encountered consists of sand and silty sand soils, concrete, asphalt, rocks (cobbles and boulders), and trace to minor amounts of deleterious materials including metal, plastic, wood and other items. The fill material ranges from less than 2 to 7 or more feet in thickness. Underlying the fill materials are natural alluvial soils consisting of silty sand and well graded sand with well graded sand with gravel, cobbles and boulders at depth. In general, the alluvial soils are in a relatively dense state. The soils are granular and based upon observation and classification, have very low expansion potential.

Groundwater

Groundwater was not encountered within the exploratory boreholes (up to 14.5 feet deep) according to the preliminary geotechnical report. Based on the search of the water well database provided in the State of California Department of Water Resource website, the depth to groundwater in two water wells located approximately one-quarter to one-half of a mile to the north-northwest of the site ranged from 193 to 232 feet during the time period from 2011 through 2018. Based on the available information, groundwater at the site appears to be at a depth of greater than 100 feet.

Ground Motion

The majority of the site lies on a relatively flat surface. The occurrence of mass movement failures such as landslides, rockfalls, or debris flows within such areas is generally not considered common and no evidence of mass movement was observed on the site.

Subsidence

Land subsidence is a regional phenomenon as a result of extensive groundwater pumping. No fissures or other surficial evidence of subsidence were identified on the project site.

Discussion of Impacts

a)

i) No Impact. The project site is not located within or adjacent to an Alquist-Priolo Earthquake Fault Zone. The closest known active earthquake fault with a documented location is the South Branch of the San Andreas fault located approximately 1.1 miles southwest of the site. In addition, the North Branch of San Andreas fault is located approximately 2.0 miles to the northeast. These faults are capable of generating earthquakes of magnitude >5.0. However, there would be no impact related to fault rupture at the project site.

ii) Less Than Significant Impact. The project site is located in a seismically active region where earthquakes originating on local and regional seismic faults can produce severe ground shaking. Buildings proposed for the site will be required to be constructed in accordance with the most recent edition of the California Building Code (CBC) and the City's Municipal Code to provide collapse-resistant design. The City has adopted several modifications to the CBC to address local geology which minimize the impact to people and property in the event of an earthquake. Project-related impacts associated with seismic ground shaking will be less than significant.

iii) No Impact. According to County General Plan, the project site is located in an area that has a moderate susceptibility to liquefaction (General Plan Figure S-3). Onsite underlying soils consist of silty sand, sand, cobbles and boulders, which could not be susceptible to liquefaction. In addition, the depth of the groundwater in the area is greater than 100 feet below the ground surface. For liquefaction to occur, groundwater levels must be within 50 feet of the ground surface. Therefore, the soil in this region is not prone to liquefaction. No impact is anticipated.

iv) No Impact. The project site has relatively flat topography, indicating no potential for landslides. The nearest hillsides and mountainous slopes are approximately 2.8 miles northeast of the property. No impacts associated with landslides will occur.

b) **Less Than Significant Impact.** The project site is susceptible to high wind erosion. Construction activities, such as grading, excavation, and soil hauling, would disturb soils and potentially expose them to wind and water erosion. However, with the application of standard construction practices and regulatory requirements, including the City's requirement for dust management during construction, soil erosion and loss of topsoil is not a concern.

In addition, the project site could be subject to erosion from storm flows during construction. The City will require the implementation of best management practices associated with storm water flows on the project site. These standard requirements, in the form of a Water Quality Management Plan, assure that erosion resulting from storm flows are controlled on and off site.

Overall impacts associated with soil erosion will be less than significant.

c) **Less Than Significant Impact with Mitigation Incorporated.** The site is not susceptible to on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse due to the distance from mountainous slopes and foothills and depth of the groundwater.

The native soils of the project site primarily consist of silty sand, sand, cobbles and boulders. The preliminary geotechnical report determined that the fill soils and the upper portions of the alluvial soil will not, in their present conditions, provide uniform and/or adequate support for the proposed improvements. However, complete removal of the fill soils, removal of the near surface alluvial soils, and the construction of engineered fill will provide an acceptable solution.

The recommendations provided in the preliminary geotechnical report (Mitigation Measure GEO-1) will ensure that onsite soils provide adequate support for the proposed project. Overall, it is recommended that soils be compacted to provide a dense, high-strength soil layer to uniformly distribute the anticipated foundation loads over the underlying soils. The construction of this compacted fill mat should incorporate the removal of the existing fill soils and the upper, loose to medium dense alluvial soil. With implementation of Mitigation Measure GEO-1, impacts will be less than significant.

d) **No Impact.** Expansive soils typically contain clay minerals that attract and absorb water, greatly increasing the volume of the soil. This increase in volume can cause damage to foundations, structures, and roadways. As described in Section VI-a.iii, above, the site's underlying soils consist of silty sand, sand, cobbles and boulders which have low shrink-swell potential Therefore, no impact associated with expansive soils will occur.

e) **No Impact**. The project would connect to the CVWD wastewater collection and treatment plant. The proposed project would not use a septic system or other wastewater disposal system. No impact would occur.

f) **No Impact.** No unique paleontological resource or geologic feature exist on the site; therefore, no impact is anticipated.

Mitigation Measures:

GEO-1 The recommendations contained in LOR Geotechnical Group, Inc. "Preliminary Geotechnical Investigation" dated May 31, 2019, pages 12 through 21, shall be implemented for all grading and construction activities on the project site. The City may require additional project-specific geotechnical engineering analysis, as necessary, to determine whether additional soil remediation or compaction is required.

Monitoring:

GEO-A The City Engineer shall review and approve building and site specific geotechnical analyses for the proposed project, which address the actual grading and building plans prior to issuance of grading permits for the proposed project.

VIII. GREENHOUSE GAS EMISSIONS Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Generate greenhouse gas emissions either directly or indirectly, that may have a significant impact on the environment?			✓	
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?			✓	

Source: Desert Hot Springs General Plan Update, 2020; City of Desert Hot Springs 2013 Climate Action Plan.

Environmental Setting

Certain gases play an important role in determining the surface temperature of the earth. Known as greenhouse gases (GHGs), these gases trap heat on the earth's surface similarly to how greenhouses function to trap heat. GHGs are produced through natural processes as well as through human activity. The human-caused (anthropogenic) emission of these gases increased since the industrial revolution, intensifying the greenhouse effect and, as a result, warming the earth's climate. GHGs include carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), and fluorinated compounds. Laws such as Assembly Bill 32 (AB 32) and Senate Bill 32 (SB 32) require all cities to reduce greenhouse gas emissions to 1990 levels by 2020 and 40 percent below 1990 levels by 2030, respectively.

The City of Desert Hot Springs Climate Action Plan (CAP) establishes a plan to meet the State emissions reduction targets for 2020 and 2030, as required by AB 32 and SB 32. According to the CAP, the City's 2010 communitywide emissions baseline is 100,799 metric tons of CO_2e ($MTCO_2e$). In order to comply with AB 32, the City would need to reduce its emissions by 49,301 $MTCO_2e$ per capita by 2030. Accounting for reduction measures set forth in the CAP, the city is projected to reduce communitywide emissions by 50,040 $MTCO_2e$, which is 739 over the City's AB 32 target.

GHG Thresholds

In December of 2008, SCAQMD formally adopted a greenhouse gas significance threshold of 10,000 MTCO2e/yr that only applies to industrial uses' stationary sources where SCAQMD is the lead agency (SCAQMD Resolution No. 08-35). This threshold was adopted based upon an October 2008 staff report and draft interim guidance document that also recommended a threshold for all Projects using a tiered approach.

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

- Tier 1: Is there an applicable exemption?
- Tier 2: Is the Project compliant with a greenhouse gas reduction plan that is, at a minimum, consistent with the goals of AB 32?
- Tier 3: Is the Project below an absolute threshold (10,000 MTCO2e/year for industrial Projects; 3,000 MTCO2e/year for residential and commercial Projects)?
- Tier 4: Is the Project below a (yet to be set) performance threshold?
- Tier 5: Would the Project achieve a screening level with off-site mitigation?

Discussion of Impacts

a, b) **Less Than Significant Impact.** The GHG emissions generated by the proposed project during construction and operational phases were projected using California Emissions Estimator Model (CalEEMod) Version 2020.4.0 (Appendix A).

Construction

The GHG emissions associated with construction activities will be limited to the construction phase and thus will be temporary. These activities include the operation of construction equipment, employee commutes, material hauling, and other ground disturbing activities. As shown in Table 5, the project will generate 130.25 metric tons of CO_2e over the 5-month construction period. There are currently no construction related GHG emission thresholds for projects of this nature. To determine of construction emissions will result in a cumulative considerable impact, construction GHG emissions were amortized over a 30-year period and added to annual operational emissions to be compared with applicable GHG thresholds from SCAQMD.

Operation

There are five emissions source categories that will be contributing either directly or indirectly to operational GHG emissions at buildout. The sources include energy/electricity usage, water usage, solid waste disposal, area emissions (pavement and architectural coating off-gassing), and mobile sources. Table 5 summarizes the projected short-term construction and annual operational GHG generation associated with the proposed development, using the same buildout assumptions discussed under Air Quality.

Table 5
Projected GHG Emissions Summary
(Metric Tons)

Phase	CO_2e (MT/YR)
Construction	
2023	130.25
Operation	
Area	0.03
Energy	10.88
Mobile	28.93
Waste	0.23
Water	0.32
Construction: 30-year amortized [1]	4.34
Total Operational	44.73
SCAQMD Threshold (commercial)	3,000.00

[1] Buildout construction GHG emissions were amortized over 30-years then added to buildout operational GHG emissions.

As shown in Table 5, the Project complies with the Tier 3 threshold for commercial and residential projects because emissions will not exceed the 3,000 MT/yr threshold. Therefore, impacts will be less than significant.

GHG emissions contribute, on a cumulative basis, to the significant adverse environmental impacts of global climate change. No single project could generate enough GHG emissions to noticeably change the global average temperature. The combination of GHG emissions from past, present, and future projects contributes substantially to the phenomenon of global climate change and its associated environmental impacts and as such is addressed only as a cumulative impact.

Although, GHG emissions are a global phenomenon and changes in GHG emissions can be difficult to attribute to a particular project. Goals and policies are in place on state, federal, and local level to control the GHG emissions to the extend feasible. The project will be subject to requirements set forth in the City's Climate Action Plan, which is consistent with Statewide goals and policies in place for the reduction of GHG emissions.

Overall, the proposed project would be consistent with local and Statewide goals and policies aimed at reducing the generation of GHGs. The proposed project's generation of GHG emissions would not make a cumulatively considerable contribution to or conflict with an applicable plan, policy, or regulation for the purposes of reducing the emissions of greenhouse gasses. Impacts would be less than significant.

Mitigation Measures:
None required.

Monitoring:
None required.

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

Source: Desert Hot Springs General Plan Update, 20020; California Department of Toxic Substances Control Hazardous Waste Website.

Environmental Setting

A material is considered hazardous if it appears on a list of hazardous materials prepared by a federal, state, or local agency or if it has characteristics defined as hazardous by such an agency. California Health and Safety Code, Section 25501 and California Code of Regulations, Title 22, Section 662601.10 define hazardous material as any material which pose a significant present or potential hazard to human health or the environment due to its quantity, concentration, or physical, chemical or infectious characteristics. Under Government Code Section 65962.5, both the California Department of Toxic Substances Control (DTSC) and the State Water Resources Control Board (SWRCB) are required to maintain lists of sites known to have hazardous substances present in the environment.

There are only a few identified hazardous/toxic material generators associated with commercial, quasi-industrial and medical operations in the City which have the potential to be associated with accidental spills, purposeful illegal dumping, air emissions, and other uncontrolled discharges into the environment.

The City has the responsibility to coordinate with the appropriate agencies in the identification of hazardous material sites, and the active regulation of their timely cleanup.

According to GeoTracker, two LUST Cleanup Sites (Expressway Market "T0606504198" and "T0606500964") were located at the southwest corner of Dillon Road and Palm Drive, approximately 0.28 miles east of the project site. Both sites have been remediated and the action closed by the County of Riverside.

Discussion of Impacts

a, b) **Less Than Significant Impact.** The Project includes development of RV storage facility and one caretaker residence which would involve use of limited quantities of chemicals such as cleaning and degreasing solvents, fertilizers, pesticides, and similar materials. These chemicals will be transported and stored within the project site. These will occur in limited quantities and will not require a hazardous material handling/storage permit. None of these chemicals will be used in sufficient quantities to pose a threat to humans or cause a foreseeable chemical release into the environment.

The construction phase would involve the use of heavy equipment, which uses small amounts of oil and fuels and other potential flammable substances. During construction, equipment would require refueling and minor maintenance on site that could lead to fuel and oil spills. The contractor will be required to identify a staging area for storing materials and will be subject to State law relating to the handling, storage and use of hazardous materials during construction.

The proposed project would not result in a significant risk of explosion or accidental release of hazardous substances, because the cleaners and household chemicals used are not explosive and will not be stored in large quantities. The use and handling of hazardous materials during construction activities and long-term operation of the proposed project would occur in accordance with applicable Federal, State, and local laws including California Occupational Health and Safety Administration (CalOSHA) requirements. Impacts would be less than significant.

c) **Less Than Significant Impact.** The project site is located approximately 1.45 miles south of Two Bunch Palms Elementary School. The proposed Project will result in the development of a RV storage facility, which is not expected to emit any hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste to jeopardize schools. No impact is expected.

d) **No Impact.** The project site is not on a parcel included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. Also, construction and operation of the project would not create a significant hazard to the public or to the environment and would have no impact.

e) **No Impact.** The Palm Springs International Airport is located approximately 5.7 miles south of the subject property. The site is not located near its airstrip and would not result in a safety hazard for people residing or working in the project area. Therefore, no impact would occur.

f) **No Impact.** The proposed Project will take access from Dillon Road, which will also be used for emergency access. Major roadways near the project site would be used as regional emergency evacuation routes to and from the city, including Palm Drive and the I-10 freeway. The project will neither significantly alter the existing circulation pattern in the project area nor physically interfere with major roadways during emergency evacuation.

The project's proposed parking and circulation plans will be reviewed by the Fire and Police Departments to assure that driveways and roads are adequate for emergency vehicles. The project includes an emergency access driveway around the building, to assure that fire trucks can access all portions of the proposed project site. A construction plan will be required by the City to assure that the project does not interfere with emergency access during development. These standard requirements will assure that there will be no impacts associated with emergency response.

g) **No Impact.** The project site is located within the valley floor where there is no potential for wildfire. Therefore, the proposed project will not expose people or structures to significant risks associated with wildfires. No project related impact is expected.

Mitigation Measures:
None required.

Monitoring:
None required.

X. HYDROLOGY AND WATER QUALITY Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?			✓	
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin?			✓	
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:			✓	
i) result in substantial erosion or siltation on- or off-site;			✓	
ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;			✓	
iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or			✓	
iv) impede or redirect flood flows?			✓	
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to Project inundation?				✓
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?				✓

Source: Desert Hot Springs General Plan Update, 2020; 2020 Coachella Valley Regional UWMP; Preliminary Hydrology Study for Desert Hot Springs RV Storage, prepared by Christiansen & Company, May 2023.

Environmental Setting

Domestic Water

The project site is within the Coachella Valley Water District (CVWD) service area for domestic water. The District's primary water source is groundwater extracted through a system of wells from the Coachella Valley Groundwater Basin. In addition to groundwater, CVWD relies on imported water that is recharged into the groundwater basin at three facilities: Whitewater River Groundwater Recharge Facility (GRF), Thomas A. Levy GRF, and Palm Desert GRF. CVWD's domestic water system includes 97 groundwater production wells and 65 enclosed reservoirs. In 2020, it pumped 99,843 acre-feet per year (AFY) of groundwater from the Indio and Mission Creek Subbasins. CVWD also owns and operates the water distribution system, which is generally located under existing streets in the public right-of-way. There are existing 12-inch water lines beneath Dillon Road in the project vicinity.

CVWD is responsible, under the California Water Code, for analyzing its current and future water supply, and assuring that sufficient supply is available to serve land uses within the District through the preparation of an Urban Water Management Plan (UWMP). CVWD is required to periodically update the UWMP. In 2020, CVWD collaborated with other water purveyors in the Coachella Valley to prepare a regional UWMP.[8]

Wastewater

CVWD provides sewer service to portions of the City of Desert Hot Springs, including the project area. CVWD maintains sewer trunk lines ranging from 6 to 36 inches in diameter and 28 lift stations and associated force mains. Effluent from Desert Hot Springs is conveyed to CVWD's Cook Street treatment plant (Water Reclamation Plant No. 10), which has a total capacity of 18 million gallons per day (mgd), including 15 mgd of tertiary treatment capacity. CVWD also implements the requirements of the Regional Water Quality Control Board pertaining to domestic water quality and wastewater discharge.

The Project site is in an urban area where sewer lines are installed under the main roads. The Project will connect to an existing 15-inch sewer line beneath Dillon Road.

Flood Control

The project site is located in the northern portion of the Coachella Valley. It has an average rainfall of 3 inches per year. Several watersheds drain the adjoining elevated terrain of the San Gorgonio and Little Bernardino Mountains towards the valley floor. The City is subject to short duration rainfall events which can generate significant amounts of surface water.

The Project site is located within a Federal Emergency Management Agency (FEMA) Zone "AO" designation. Zone AO is defined as "Areas of 1% annual chance flood with average depths of 1 to 3 feet."

The Riverside County Flood Control District (RCFCD) is responsible for the management of regional drainage within and in the vicinity of Desert Hot Springs, including rivers, major streams and their tributaries, and areas of significant sheet flooding. The City works with RCFCD to manage the local drainages within the City.

Surface Water Quality

The City is a co-permittee with Riverside County in federal the National Pollutant Discharge Elimination System (NPDES), and enforces NPDES standards and requirements for all new development. NPDES standards assure that construction and operational surface water flows do not pollute local groundwater resources. In addition, the RWQCB enforces State regulations associated with surface water quality.

Description of Impact

a) **Less Than Significant Impact.** The proposed Project will generate demand for domestic water and wastewater, which will be governed by CVWD standard requirements. Construction of on-site connections will be subject to all CVWD requirements. The proposed project will not violate water quality standards or waste discharge requirements.

The proposed project will be required to comply with CVWD and National Pollutant Discharge Elimination System (NPDES) regulations to minimize the pollutant load associated with urban activities. Meeting those standards requires the preparation and approval of a WQMP and Storm Water Pollution Prevention Plan, both of which must be approved by the City prior to the initiation of construction activities. Both plans will include Best Management Practices that will protect surface waters from pollutants in storm flows during both construction and long-term operation of the project. The imposition of conditions of approval and adherence to local, state and federal requirements will assure that impacts associated with water quality standards are less than significant.

[8] 2020 Coachella Valley Regional Urban Water Management Plan, Water Systems Consulting, Inc., June 30, 2021.

b) **Less Than Significant Impact.** The project would result in a 1,492 square foot caretaker residence and 30,320 square feet of landscaping areas which would require water from CVWD, whose water source is ground water. The implementation of the proposed project would not involve drilling a new well to serve the site. Based on the California Department of Water Resources 2023 indoor water use efficiency standard for residential uses and CVWD's Maximum Applied Water Allowance (MAWA), the project has the potential to generate a domestic water demand of 2.03 acre-feet per year.

Table 6
Water Demand at the Project Buildout

Proposed Land Use	**Units**	**Water Demand Factor (gal/unit/day)**	**Water Demand (gpd)**	**Water Demand (AFY)**
Caretaker Residence	1	55	55	0.06
Proposed Land Use	**Landscaped Area**	**CVWD MAWA**		**Water Demand (AFY)**
Landscaping	30,320 SF or 0.69 AC	2.85 AFY per AC		1.97
TOTAL				**2.03**

The 2020 Coachella Valley Regional Urban Water Management Plan (UWMP) was prepared jointly by six water purveyors in the Coachella Valley, including the CVWD that serves the project site. The UWMP demonstrates that CVWD currently has, and can supply in the future, sufficient water to serve additional development in its service area in normal, single dry, and multiple dry years (UWMP Tables 4-25 through 4-27). CVWD's projected 2045 retail water supply is 164,966 acre-feet. The projected annual water demand for the proposed project is 2.03 acre-feet, which is approximately 0.001% of the 2045 projected retail water supply. The proposed project is consistent with the commercial and residential land uses allowed in the Mixed-Use Corridor land use designation. This General Plan designation was used by CVWD to project future water demand. Therefore, the Project's water demand is consistent with CVWD projections for future water needs in the area. The proposed Project will connect to existing water lines within Dillon Road. No new wells or additional water infrastructure are proposed.

Based on the 2020 Regional Urban Water Management Plan, CVWD will be able to fulfill the Project's water demand. The Project will be required to comply with the CVWD's water-efficiency requirements, including the use of drought-tolerant planting materials and limited landscaping irrigation. Implementation of these and other applicable requirements will assure that water-related impacts are less than significant.

c) **Less Than Significant Impact.** The project site is currently undeveloped land. Development of the proposed project will increase impermeable surfaces on site, and therefore will increase on-site storm flows.

Christiansen & Company prepared a Preliminary Hydrology Study for the project site in May 2023. According to the drainage report, on-site retention for the 100-year, 24-hour storm event will be provided, as per the City of Desert Hot Springs requirements. Onsite drainage facilities will consist of valley gutters (inverted section), one 36"'x36" grate inlet, 72" Contech CMP perforated Pipe Underground Storage Chamber and proposed retention basin. The Contech Chamber shall have a total capacity of 5044 cf. Once capacity has been met in the chamber the overflow shall traverse to the onsite retention basin (25880 cf) via a 24" HDPE Storm Drainpipe. The proposed site shall contain 100% of the critical 100 yr storm event.

The proposed project will be required to comply with the City's storm water retention requirements. Implementation of these and other applicable requirements will assure that the project will not create or contribute water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff.

d) **No Impact.** The project site is not located in the vicinity of a water body, therefore, no hazard from dam failure, tsunami or seiche is possible. No impact is anticipated.

e) **No Impact**. The proposed Project will be required to comply with all applicable water quality standards and will implement a WQMP approved by the City of Desert Hot Springs and the Regional Water Quality Control Board for both construction activities and long-term operation of the site. Also, the project's expected water demand will be less than one percent of CVWD's planned increases in demand for groundwater supplies, meaning impacts to a groundwater management plan will be negligible.

Mitigation Measures:
None required.

Monitoring:
None required.

XI. LAND USE AND PLANNING Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Physically divide an established community?				✓
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?				✓

Source: Desert Hot Springs General Plan Update, 2020.

Environmental Setting

The project site is governed by the policies and land use designations of the Desert Hot Springs General Plan and Zoning Ordinance. Currently, the site is designated as Mixed-Use Corridor (MU-C) in the City's General Plan Land Use Map, which allows for higher-intensity, commercially oriented development with maximum residential densities of 30 dwelling units per acre and/or maximum nonresidential intensities of 1.50 FAR. Under the City's Municipal Code, structures of up to 60 feet are permissible in this district.

Discussion of Impacts

a) **No Impact**. The subject property is currently vacant and is located in an area that consist of commercial, residential and vacant lands. The developed lands operate independently of the subject property and will not be physically divided by the proposed project. No impact is anticipated.

a) **No Impact**. The Desert Hot Springs General Plan, as required by the California Government Code, establishes direction for future growth and development within the City of Desert Hot Springs. The California Government Code (under Sections 65451.b and 65454) states that a "specific plan shall include a statement of the relationship of the specific plan to the general plan, and further, that it may not be adopted or amended unless found to be consistent with the general plan."

The Project site is designated as Mixed-Use Corridor (MU-C) in the General Plan. The intent and purpose of the MU-C is to allow for higher-intensity, commercially oriented development with maximum residential densities of 30 dwelling units per acre and/or maximum nonresidential Intensities of 1.50 FAR. The project proposes a RV storage facility and onsite caretaker residence. MU-C permits and conditionally permits service uses, such as vehicle service and fueling stations, as well as a variety of commercial retail uses. It does not permit storages services, including personal storage and outdoor recreational vehicle (RV) storage. However, the project site (eastern parcel) includes an existing mini-storage (personal). The addition of outdoor RV storage or additional personal storage would not meaningfully change the character or use of the land.

Caretaker quarters are not a permitted use in the MU-C zone. However, given that the MU-C permits various residential uses, the addition of caretaker quarters would be consistent with the character of the area as proposed in the General Plan and would not conflict with the proposed uses.

The DSSP would modify the proposed permitted uses on the site to and let the proposed land uses to be developed without conflicting the zoning designations. The California Government Code provides authority for a city to adopt a specific plan by ordinance (as a regulatory plan) or resolution (as a policy plan). The DSSP would be adopted by the Desert Hot Springs City Council as an

ordinance and would function as the regulatory document that serves as the zoning for the project site; the DSSP establishes the prevailing land use regulations for all development activities within the project site.

Proposed site development plans or other similar entitlements would be required to be consistent with the regulations set forth in the DSSP.

General Plan Consistency

LAND USE AND COMMUNITY DESIGN ELEMENT

GOAL LU-1: A balanced community with a mix of land uses that supports thriving businesses, complete and healthy neighborhoods, and a sustainable desert environment.

Policy LU-1.1: Balanced Growth.
Support development and growth that balance residential, commercial, industrial, and open space uses in a manner that meet the needs of the community without overburdening community resources and infrastructure.

Policy LU 1.3: Compatibility.
Require that new development be visually and functionally compatible with established residential neighborhoods, industrial and commercial areas, and natural desert habitat areas.

Policy LU-1.4: Sustainability.
Promote sustainable land uses and building practices that promote efficient energy use and resource sustainability.

Policy LU-1.7: Infrastructure.
Ensure that infrastructure is integrated into the community concurrently with new development projects.

Consistency:
The proposed Project will provide commercial uses to the southern portion of the City. The plans and design guidelines provided for the Project will ensure that the two subject properties have a unified frontage that will not detract from the existing visual character of the area. The use of landscaping and a screening wall will ensure that the proposed development is visually and functionally compatible with existing and future residential and mixed use development in the area.

The proposed development will not overburden existing infrastructure, and is expected to have nominal impacts related to traffic volumes, water usage, and energy usage. Any required infrastructure extensions and roadway improvements will be implemented concurrently with development of the Project. Adherence to all applicable Title 24 building and energy requirements will ensure that the Project uses energy in an efficient and sustainable manner.

GOAL LU-3: Vibrant and economically successful commercial centers that respond to changing economic conditions and that are well distributed citywide.

Policy LU-3.11: Efficiency in Providing City Services and Infrastructure.
Accommodate a diversity of uses that create a tax base which allows the City to maintain efficient operations in the delivery of services and maintenance of public infrastructure, including community centers, parks, roads, storm drainage, and other infrastructure.

GOAL LU-7: Strategically located and dynamic mixed-use environments that offer neighborhood-serving amenities, new and emerging housing types, and engaging public spaces.

Policy LU-7.1: Mixed-Use Commercial Component.
Encourage that new mixed-use development projects include a substantial viable, commercial component. Consider innovative incentives and startup funds to help improve long-term longevity of commercial uses.

Consistency:
The proposed Project will provide commercial development to the southern portion of the City, an area which is currently sparsely developed. The Project would bring an additional commercial occupant to an area planned for mixed-use development, tax revenue from which will contribute to the City's ability to deliver services and maintain infrastructure.

Policy LU-7.2: Mixed-Use Street Interface.
Ensure that development enhances pedestrian activity by providing active uses, walkability, and connectivity within mixed-use districts. Require appropriate design features along a majority of the building street frontage.

Policy LU-7.5: Connections.
Require pedestrian connections between varying land uses and buildings to encourage safe access.

GOAL LU-12: Citywide design and development that enhances the community's distinctive character and preserves the natural and scenic resources.

Policy LU-12.2: Appropriate Architectural Design.
Encourage development that integrates desert-appropriate architecture, utilizing appropriate massing, scale, colors, and roofing.

Consistency:
The Specific Plan will ensure that the proposed development is appropriate for the character and conditions of the site and the desert setting. The development will include the addition of sidewalks as well as space for future bicycle lanes on the Project side of Dillon Road, connected to internal sidewalks connecting the two sites. Easements for the future development of Beacon Way and Wolven Street include space for future sidewalks and bicycle lanes. This will ensure that as surrounding properties build out with residential and mixed uses, safe access will be provided for all modes of transportation.

MOBILITY AND INFRASTRUCTURE ELEMENT

GOAL MI-2: Streets that are designed and managed to enable safe access for all users: pedestrians, equestrians, bicyclists, motorists, and transit riders of all ages and abilities.

Policy MI-2.2: Balanced Transportation System.
Implement a balanced transportation system using complete streets principles to ensure that safety and mobility of all users.

Policy MI-2.4: Accessibility.
Identify and evaluate the system for potential improvements to accommodate seniors and disabled persons and to comply with ADA requirements.

Policy MI-2.6: Rights-of-Ways.
Use available public rights-of-ways to provide wider sidewalks, bicycle lanes, trail facilities, and transit amenities.

GOAL MI-4: Connected pedestrian and bicycle network.

Policy MI-4.1: Prioritize Walking.
Recognize walking as a component of every trip and ensure high quality pedestrian access in all site planning and public right-of-way modifications to provide a safe and comfortable walking environment.

Policy MI-4.4: Pedestrian Connections through Parking Lots.
Require parking lots to include clearly defined paths for pedestrians' safe and convenient access from building entrances and to adjoining public sidewalks.

Consistency:
The SP requires compliance with the City's ADA requirements, including the provision of sufficient van-accessible handicap parking spots. Project improvements to half the ROW will include the addition of sidewalks to Dillon Road, and easements for future sidewalks on Beacon Way and Wolven Street. An internal sidewalk will also be provided, linking the two properties. Space for future bicycle lanes will also be provided in Dillon Road, Beacon Way, and Wolven Street. As the General Plan is built out in the Project area, these improvements will support accessibility and safety for those traveling on foot or by bicycle.

GOAL MI-11: Provide for a sustainable physical infrastructure to support a desirable quality of life.

Policy MI-11.9: Flood Prevention.
Support flood prevention infrastructure on and around Mission Creek and Morongo Wash areas and other areas of the City prone to flooding.

Policy MI-11.10: Water Quality.
Protect the quality and supply of the City's water sources.

Policy MI-11.11: Reduce Energy.
Implement regulations and provide incentives that require public and private developments to reduce energy use over the long term.

Consistency:
The Project will include an on-site retention basin to manage stormwater. The Hydrology Study prepared for the Project ensures that adequate drainage will be provided on-site to retain the 24-hour, 100-year storm. The WQMP prepared for the Project will ensure that the Project will not have significant adverse effects on the City's water quality.

Compliance with the Title 24 standards, including the provision of photovoltaic panels on the roof of the RV storage canopy, will enable the Project to off-set some of its energy consumption, thereby reducing the use of energy produced by external sources.

OPEN SPACE AND NATURAL RESOURCES ELEMENT

GOAL IS-1: Protect habitat and natural washes that are protected, managed, and preserved.

Policy OS-1.5: Biological Resources Assessment.
Require a biological resources assessment, as appropriate, for any development proposal or infrastructure project located on undeveloped/undisturbed land.

GOAL OS-2: Air quality that is healthy for residents and the environment.

Policy OS-2.3: Minimize Air Quality Impacts.
Minimize the air quality impacts of new development projects on established uses.

Policy OS-2.8: Air Quality and Climate Change Analyses.
Require detailed air quality and climate change analyses and mitigation plans for all applications that have the potential to adversely affect air quality.

Consistency:
A biological resources assessment was prepared for the Project in order to ensure that any protected habitat or species on-site will be managed and preserved. Air quality and greenhouse gas analysis, including modeling of potential pollutant emissions using the California Emissions Estimator Model (CalEEMod), was conducted for the proposed Project. The analysis determined that the Project would not have significant air quality impacts, including on established uses.

GOAL OS-3: A sustainable, reliable, and clean water supply.

Policy OS-3.1: Water Conservation.
Require water conservation measures in new development, equivalent to CalGreen Tier One or similar standards.

Policy OS-3.3: Runoff Pollution.
Encourage use of creative and environmentally sustainable ways of reducing groundwater and urban runoff pollution, including the National Pollutant Discharge Elimination System (NPDES) requirements of the Regional Water Quality Control Board.

Policy OS-3.6: Landscaping.
Require climate appropriate landscaping for new development, and limit turf to be used as accent only.

Policy OS-3.9: Groundwater Contamination.
Evaluate all proposed land use and development plans for their potential to create groundwater contamination hazards from point and non-point sources, and confer with other appropriate agencies to assure adequate review.

Policy OS-3.10: Site Drainage.
Require that new development incorporate features into site drainage plans that reduce impermeable surface area, increase surface water infiltration, and minimize surface water runoff during storm events. Such features may include additional landscape areas, parking lots with bio-infiltration systems, permeable paving designs, and stormwater detention basins.

GOAL OS-4: Increased energy efficiency and conservation.

Policy OS-4.4: Solar Energy Systems.
Encourage the use of solar energy systems or any other technologies that similarly reduce the use of power from the grid in residential and commercial uses.

Consistency:
The landscaping for the proposed Project will comply with the City's requirements for the efficient use of water in landscaping and irrigation. Plants selected for the site are drought-tolerant and the landscaping does not propose any turf. The Hydrology Study and WQMP prepared for the Project ensure that the proposed developed will have adequate water retention capability as to minimize stormwater runoff and prevent groundwater contamination. The Project will install solar panels on the roof of the RV storage canopy.

GOAL OS-7: Protected viewsheds, scenic corridors and neighborhood aesthetics.

Policy OS 7.2: Nighttime Views.
Preserve the quality of nighttime views through required shielding and downward-facing lights.

Policy OS 7.3: Drought-Tolerant Landscaping.
Review landscape plans and require that climate-appropriate landscaping be used throughout the City in public and private landscape plans.

Consistency:
Consistent with §17.40.170 of the City's development code, outdoor lighting in the SP area must be shielded in order to minimize light pollution. Landscaping, as proposed in the Preliminary Landscape Plan, must comply with the requirements provided in Chapter 17.56 of the development code for the efficient use of water in landscaping and irrigation. Plants selected for the site are drought-tolerant and the landscaping proposes the use of crush rock ground coverings instead of turf.

GOAL OS-8: Cultural and historic resources are preserved, protected, and celebrated.

Policy OS-8.5: Archaeological Resources.
Assure that all development properly addresses the potential for subsurface archaeological deposits by requiring archaeological surveys.

Policy OS-8.6: Cultural Resources.
Review all development and redevelopment proposals for the possibility of cultural resources.

Policy OS-8.7.
Coordinate CEQA review of proposed developments as either being identified as having a High A or Undetermined potential for unearthing paleontological resources.

Consistency:
A historical/archaeological resources study was prepared for the Project, ensuring that archaeological and cultural resources will not be impacts by the proposed Project. No unique paleontological resources have been identified on the SP site.

SAFETY AND NOISE ELEMENT

GOAL SN-1: High level of fire protection services for the community, including adequately addressing wildfires.

Policy SN-1.3: New Development Impacts.
Require all new and improved developments to be reviewed for their impact on safety and the provision of police and fire protection services.

Policy SN-1.4: Development Proposal Review.
Require development proposals to be transmitted to the Police Department and the Fire Marshal for review. Any input shall be incorporated into project design or conditions of approval, as appropriate.

Policy SN-1.5: Vehicle Access.
Require that emergency, police, fire, and paramedic vehicle access be provided with all new developments to the satisfaction of the Fire Marshal and Police Chief.

Policy SN-1.19: Fire Safe Regulations.
New development will adhere to the latest Board of Forestry and Fire Protection Fire Safe Regulations.

Policy SN-1.20: Building and Fire Codes.
New development will adhere to all requirements in the California Building Code and California Fire Code.

GOAL SN-3: Lower risk of exposure of life, property, and the environment to hazardous and toxic materials and waste.

Policy SN-3.2: Use and Storage of Hazardous Materials.
Require the general location and siting of facilities which involve the use and/or storage of hazardous, highly flammable, or explosive materials to be designed in a manner that assures the highest level of safety in strict conformance with fire codes and all other applicable codes and regulations.

Consistency:
The proposed project will be required to comply with the Board of Forestry and Fire Protection Fire Safe Regulations as well as the requirements of the California Building and Fire Codes. The development proposal will be subject to review from the Fire Marshall and Police Chief to ensure that sufficient access and safety measures are provided. The Project proposes RV storage, including a propane service area. Any propane stored on site will be required to comply with all applicable local and state codes and other regulations pertaining to hazardous materials.

GOAL SN-4: Responsive and effective emergency preparedness that assures readiness to respond to natural and human-caused disasters.

Policy SN-4.2: Evacuation Preparedness.
Coordinate with appropriate agencies for the establishment of emergency evacuation routes and plans to preserve or reestablish the use of Palm Drive, Mission Lakes Boulevard, Pierson Boulevard, Dillon Road, Hacienda Avenue, Interstate 10, and State Highway 62 as emergency evacuation routes.

GOAL SN-6: Resiliency against seismic hazards and preparedness to respond after a seismic event.

Policy SN-6.3: Geotechnical Studies.
Require geotechnical studies for development proposals located in areas with soils susceptible to liquefaction or other forms of ground failure. If found to have the potential for liquefaction, further analysis may be necessary to determine level of hazard risk and proposed appropriate mitigation measures.

GOAL SN-7: Assure resiliency against flooding hazards, and provide the tools needed to respond to flood events.

Policy SN-7.7: Hydrological Studies.
Require new development proposals to provide hydrological studies prepared by a State-certified civil engineer for any project that would change existing site runoff. Such studies shall assess the impact of any change in runoff that could result in increased erosion and sedimentation potential or flooding of downstream properties.

Consistency:
Review of the project plans by the City and the Fire Marshal will ensure that the project does conflict with the potential use of Dillon Road as an evacuation route. A geotechnical study was prepared for the Project, including measures to ensure that the Project adequately mitigates any potential geotechnical hazards. As previously stated, a hydrological study was also prepared to ensure that runoff from a 24-hour 100-year storm can be retained on-site and therefore the Project would not contribute to erosion, sedimentation, or flooding of downstream properties.

GOAL SN-8: A noise environment that provides peace and quiet that complements the city's spa resort character.

Policy SN-8.5: Compatible Land Uses.
Designate land uses that are compatible with higher noise levels adjacent to major arterial roads and highways, the Interstate10 corridor, or designated industrial lands.

Consistency:
The project will be subject to the City's noise regulations. It is situated on a minor arterial road, with similar commercial uses on the adjacent properties to the east and west of the subject site.

As shown above, the proposed project will be consistent with adopted plans and programs, and impacts to land use policy are expected to be less than significant.

Mitigation Measures:
None required.

Monitoring:
None required.

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

Source: Desert Hot Springs General Plan Update, 2020.

Environmental Setting

The majority of the City is made up of alluvial fans, containing mostly sand and gravel which do represent an important economic resource, used for road base and similar applications. Other mineral deposits occurring in the region include copper, limestone, specialty sands, and tungsten. These deposits are limited to rocky outcroppings occurring in the Little San Bernardino Mountains and have not been exploited.

Discussion of Impacts

a, b) **No Impact.** There are no permitted mining operations in the vicinity of the project site, nor does this area of the City lend itself to mining activities, as described in the General Plan. The project site is located in an urbanized area designated for commercial development and is not zoned for mineral resource extraction. No impact is expected.

Mitigation Measures:
None required.

Monitoring:
None required.

XIII. NOISE Would the project result in:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the Project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?			✓	
b) Generation of excessive groundborne vibration or groundborne noise levels?			✓	
c) For a Project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the Project expose people residing or working in the Project area to excessive noise levels?				✓

Source: Desert Hot Springs General Plan Update, 2020.

Environmental Setting

Noise is generally defined as sound that is loud, disagreeable, or unexpected. The selection of a proper noise descriptor for a specific source is dependent on the spatial and temporal distribution, duration, and fluctuation of the noise. The noise descriptors most often encountered when dealing with traffic, community, and environmental noise include an overall frequency-weighted sound level in decibels that approximates the frequency response of the human ear (in dBA).

Noise can be generated by a number of sources, including mobile sources, such as automobiles, trucks, and airplanes, and stationary sources, such as construction sites, machinery, and industrial operations. The rate depends on the ground surface and the number or type of objects between the noise source and the receiver. Mobile transportation sources, such as highways, and hard and flat surfaces, such as concrete or asphalt, have an attenuation rate of 3.0 dBA per doubling of distance. Soft surfaces, such as uneven or vegetated terrain, have an attenuation rate of about 4.5 dBA per doubling of distance from the source. Noise generated by stationary sources typically attenuates at a rate of approximately 6.0 to 7.5 dBA per doubling of distance from the source (EPA 1971).

Sound levels can be reduced by placing barriers between the noise source and the receiver. In general, barriers contribute to decreasing noise levels only when the structure breaks the “line of sight” between the source and the receiver. Buildings, concrete walls, and berms can all act as effective noise barriers. Wooden fences or broad areas of dense foliage can also reduce noise, but are less effective than solid barriers.

The City has established goals, policies, and programs to limit and reduce the effects of noise intrusion on sensitive land uses and to set acceptable noise levels for varying types of land uses.

The project site is located on Dillon Road, which is designated as a “Secondary Street” in the City’s Circulation Element. Noise levels on Dillon Road were estimated to be 75 dBA CNEL at the centerline, reducing to 60 dBA CNEL at the south end of the project site (General Plan; Figure SN-6).

As part of the development of the Noise Element of the General Plan, noise level measurements were collected at various locations throughout the City to set standards for normally acceptable, conditionally acceptable, and clearly unacceptable noise levels. For commercial and residential land uses, the conditionally acceptable noise levels are 80 and 65 dBA CNEL, respectively (General Plan; Table SN-2).

Discussion of Impacts

a) **Less Than Significant Impact.** The subject property is currently vacant without any noise source. The main noise source in the area is vehicular traffic on adjacent roadways (Dillon Road and Palm Drive). The surrounding area mainly consists of roads, commercial and residential development and vacant lands. The nearest sensitive receptor is a single-family home located immediately east of the existing mini-storage facility onsite.

Impacts of the Proposed Project on Surrounding Development

Construction Impacts: Construction noise associated with the proposed project would be temporary and would vary depending on the nature of the activities being performed. Noise generated would primarily be associated with the operation of off-road equipment for on-site construction activities. Construction noise typically occurs intermittently and varies depending on the nature or phase of construction (e.g., grading, construction, paving). Noise generated by construction equipment, including earth movers, material handlers, and portable generators, can reach high levels up to 83 dBA at a distance of 50 feet which could be annoying for the nearby sensitive receivers and would exceed the City's standard for noise at residential land uses.

The City regulates construction noise through Section 8.12 and Section 9.04.030 of the Municipal Code which limits the construction times between the hours of 7:00 a.m. until 5:00 p.m. daily, with no construction activity allowed on Sunday. During daylight savings time, construction activities shall be permitted between the hours of 6:00 a.m. until 6:00 p.m. daily.

Noise levels surrounding the Project site could be elevated for short periods of time, as equipment moves through the site. In addition, these noise levels would be limited to the less sensitive daytime hours and would cease once building construction concludes. Compliance with the City's noise ordinance exempts construction activities from noise infractions, because of their temporary nature. Therefore, impacts associated with construction noise on the project site would be less than significant.

Long-Term Operational Impacts: At buildout, principal project-related noise sources will include vehicular traffic accessing the site, grounds maintenance equipment, and heating, ventilation, and air conditioning (HVAC) units. The project is generally consistent with the General Plan designation for the site, and traffic levels are not expected to substantially increase beyond that forecast in the General Plan at build out.

For commercial and residential land uses, the conditionally acceptable noise levels are 80 and 65 dBA CNEL, respectively (General Plan; Table SN-2). According to the General Plan (Figure SN-7), future noise levels on Dillon Road are estimated to be 75 dBA CNEL at the centerline, reducing to 65 dBA CNEL on the project site. These noise levels are within the normally acceptable noise range for commercial and residential uses (maximum of 75 and 65 dBA CNEL). Therefore, Project operational noise will increase noise levels in the area, but they will not exceed General Plan standards. Impacts will be less than significant.

b) **Less Than Significant Impact.** In terms of ground-borne vibration resulting from construction activities, it is expected that project construction will result in only intermittent, localized intrusion. Vibration levels are not expected to exceed Caltrans vibration threshold of 0.04 in/sec PPV, and thus impacts would be less than significant.

c) **No Impact.** The site is not located with the Palm Springs International Airport noise contours. No impacts will occur.

Mitigation Measures: None

Monitoring: None

XIV. POPULATION AND HOUSING Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?				✓
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?				✓

Source: Desert Hot Springs General Plan Update, 2020; U.S. Department of Finance, Population and Housing Estimates for Cities, Counties, and the State; 2020-2045 RTPSCS Demographics and Growth Forecast by Southern California Association of Governments.

Environmental Setting

As of 2023, the population of the City of Desert Hot Springs is 32,608. The Southern California Association of Government has predicted a population of 61,000 for the City in 2045 with an estimated 24,700 households.

Discussion of Impacts

a) **No Impact.** The Project proposes a RV storage facility and caretaker residence. Using the city's average household size of 2.99 persons, the project could potentially include a permanent population of approximately 3 persons. This represents 0.005% of the city's anticipated 2045 population of 61,000, which would have a less than significant impact on the overall population of the area.

The western parcel is currently vacant and undeveloped. The project occurs on the City's existing street grid and will tie into existing utility systems. Since existing streets, utilities and public facilities are located adjacent to the project site along Dillon Road, the project will not result in the construction or expansion of new infrastructure. Overall, less than significant impacts are anticipated.

Construction and operation of the project will generate jobs. However, construction is expected to be fulfilled by the local labor market. Given the current labor market, it is more likely that the new jobs will be filled by existing residents than new residents attracted to the area by the proposed project. Impacts will be less than significant.

b) **No Impact.** The proposed project site is composed of vacant land. No structures or housing will be eliminated as a result of the project, and no persons will be displaced. No impact is anticipated.

Mitigation Measures:
None required.

Monitoring:
None required.

XV. PUBLIC SERVICES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?			✓	

Source: Desert Hot Springs General Plan Update, 2020.

Environmental Setting

Fire Protection: The City contracts with CAL FIRE for its local service. The nearest fire station is Station 37 at 65958 Pierson Boulevard, approximately 2.6 miles north of the subject property.

Police Protection: The Desert Hot Springs Police Department is responsible for law enforcement and residents' safety in the City. The main police station operates at 65950 Pierson Boulevard, approximately 2.6 miles north of the subject property.

Schools: The project site is located within the Palm Springs Unified School District (PSUSD), which provides public school facilities to accommodate students. The PSUSD currently operates sixteen elementary schools, four middle schools, three alternative high schools, and four high schools throughout its service area. The District uses portable classroom buildings on most campuses in addition to permanent classroom facilities. The nearest school to the project site is Two Bunch Palms Elementary School, located approximately 1.45 miles north of the subject property.

Parks: A total of 223 acres of land is dedicated for parks in the City. The City prepared its Parks and Recreation Master Plan in 2013 to guide the City's delivery of parks and recreation facilities and services for the next 10 years (2013 to 2023). The nearest park to the project site is Desert Hot Springs Soccer Park, approximately 1.3 miles northeast of the site.

Discussion of Impacts

a) **Less Than Significant Impact.** The proposed project site is currently undeveloped vacant land. The ultimate development of the proposed project site will result in the addition of an RV storage facility and one caretaker residence that would marginally increase the demand on fire service in the City. The proposed project will result in a fully sprinklered building, which will reduce the demand on fire services. Further, the proposed use is not at high risk for fire. The existing Fire Department is furnished with sufficient number of a staff (firefighting personnel) and equipment available during each 24-hour period, which should accommodate the marginal increase in the service demand.

Fire personnel will be able to reach the site within the target five-minute response time. Emergency access will be provided to the property via the existing public roadway network.

The City has designed Development Impact Fees to allow new development to pay its fair share of future facilities, which will also be required of the proposed project. The project Applicant will be required to pay the City's development impact fee.

The Fire Department will review the project site plan to ensure it meets applicable fire standards and regulations. No construction of new or expanded fire services or facilities are required for the proposed project. Project-related fire protection impacts will be less than significant.

b) **Less Than Significant Impact.** Development of the project site could potentially result in a need for police protection services to respond to any potential incidents that may occur at the site. However, the project site is located in a developed part of the City that currently receives police service. While a new commercial and residential land use would require services, it would not result in the need for new police personnel or facilities, as services can adequately be provided by existing personnel out of existing facilities. Therefore, this impact is less than significant.

c) **Less Than Significant Impact.** The proposed project has the potential to generate up to 3 residents. The project will be subject to the PSUSD developer fees in place at the time development occurs, which currently stands at $4.79 per square foot of residential and $0.78 per square foot of commercial. Payment of the developer fee would mitigate potential significant impacts to school resources to less than significant levels.

d,e) **Less Than Significant Impact.** The proposed project will result in the development of an RV storage facility and caretaker residence, which would generate a population of up to 3 residents (0.005% of 2045 population projections). The proposed development will not induce substantial population growth that would result in significant impacts such as physical deterioration or construction of new recreational facilities or other public facilities. Less than significant impacts are anticipated.

Mitigation Measures:
None required.

Monitoring:
None required.

XVI. RECREATION	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?				✓
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?				✓

Source: Desert Hot Springs General Plan Update, 2020.

Environmental Setting

There are several mini parks, neighborhood parks, community parks, and special use centers in the City. For future development within the City, park acreage standards are generally established through an acreage requirement per 1,000 residents. The Subdivision Map Act and the Quimby Act (Section 66477 of the Govt. Code) relating to parkland dedication allows a city to adopt a local ordinance establishing a citywide park standard and the requirement of parkland dedication, or fair market value in-lieu fees, when there is residential development.

Discussion of Impacts

a, b) **No Impact.** The proposed project will result in the development of an RV storage facility and caretaker residence, which would generate a population of up to 3 residents (0.005% of 2045 population projections). The proposed development will not induce substantial population growth that would result in significant impacts such as physical deterioration or construction of new recreational facilities to existing parks or recreational facilities. Less than significant impacts are anticipated.

Mitigation Measures:
None required.

Monitoring:
None required.

XVII. TRANSPORTATION/TRAFFIC Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?			✓	
b) Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?			✓	
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?				✓
d) Result in inadequate emergency access?				✓

Source: Desert Hot Springs General Plan Update, 2020; Project materials.

Environmental Setting

Existing Conditions

The Project site is currently undeveloped and does not generate any traffic. Key roads in the Project area include Dillon Road and Palm Drive. Dillion Road is an east-west Secondary I roadway partially built out with two lanes with an ultimate width of four lanes to be divided by a medium. Palm Drive is a north-south roadway classified as an Urban Arterial south of Dillon Road, and a Primary I roadway north of Dillon Road. Palm Drive is partially buildout with two lanes in each direction north of Dillion Road, with an ultimate width of three lanes in each direction. South of Dillon Road, Palm Drive is partially built out with two lanes in each direction with an ultimate wide of four lanes in each direction.

There are currently sidewalks along the frontage of the existing mini-storage facility onsite. In the project vicinity, sidewalks are limited to frontages of developed lots.

SunLine Transit Agency provides bus transit services to the Coachella Valley, including Desert hot Springs. The nearest bus stop is on Palm Drive at Dillon Road approximately 0.25 miles east of the Project site.

Level of Service Threshold and VMT Analysis

The City's acceptable Level of Service (LOS) for both roadway and intersection operations is Level-of-Service (LOS) D or better. Effective July 1, 2020, the California Environmental Quality Act (CEQA) Guidelines require lead agencies to adopt Vehicle Miles Traveled (VMT) as a replacement for automobile delay-based LOS as the measure for identifying transportation impacts for land use projects. Because the City of Desert Hot Springs does not have its own VMT guidelines, VMT analysis herein is based on the adopted Riverside County "Transportation Analysis Guidelines for Level of Service & Vehicle Miles Traveled."

Discussion of Impacts

a) Less Than Significant Impact

Project Trip Generation

Trip generation represents the amount of traffic that is both attracted to and produced by a development. To estimate the Project's trip generation, the Project traffic analysis applied trip generation rates for Mini-Warehouse (land use code 151) and Single-Family Detached Housing (land use code 210), as provided by the Institute of Transportation Engineers (ITE) in its Trip Generation Manual 11th Edition, to the Project. Based on these rates, the Project is estimated to generate approximately 37 new trips per day, including 4 AM peak hour trips and 4 PM peak hour trips (Table 7).

Table 7
Project Trip Generation Summary

Trip Generation Rates[1]					
Land Use	**ITE LU Code**	**Unit**	**Total AM Peak Hour**	**Total PM Peak Hour**	**Daily**
Mini-Warehouse	151	HSU[2]	1.39	1.95	17.96
Single-Family Detached Housing	210	DU	0.74	0.99	9.44
Project Trip Generation Results					
Land Use	**Quantity**	**Unit**	**Total AM Peak Hour**	**Total PM Peak Hour**	**Daily**
Mini-Warehouse	1.45	HSU	3	3	27
Single-Family Detached Housing	1	DU	1	1	10
				TOTAL	**37**

[1] Trip Generation Source: Institute of Transportation Engineers (ITE) Trip Generation Manual, 11th Edition.
[2] HSU = Hundred (RV) Storage Units

Level of Service (LOS)

Roadway traffic operations are defined in terms of Level of Service (LOS), a qualitative description of traffic flow ranging from LOS A (free-flowing conditions) to LOS F (breakdown in flow resulting in stop-and-go conditions). The City's General Plan identifies LOS D as the minimum threshold for acceptable traffic condition. According to the City's General Plan, the intersection of Palm Drive at Dillon Road, approximately 0.25 miles east of the Project site, would operate at unacceptable levels of service at buildout (2040) after implementation of intersection improvements. This impact was found to be significant and unavoidable in the City's General Plan Update EIR, and a statement of overriding considerations was adopted.

The City refers to the County of Riverside Transportation Analysis Guidelines (December 2020) ("TA Guidelines") to determine if certain types of projects, because of their size, nature, or location, are exempt from the requirement of preparing a traffic impact analysis. As specified in Appendix B of the County's TA Guidelines, certain types of development proposals are generally exempt from the requirement to prepare a Level of Service transportation impact analysis, including the following:

- Mini-storage yards
- Any use which can demonstrate, based on the most recent edition of the Trip Generation Report published by the Institute of Transportation Engineers (ITE) or other approved trip generation data, trip generation of less than 100 vehicle trips during the peak hours.

The proposed project consists of a mini-storage yard (RV storage) and is forecast to generate fewer than 100 trips during the weekday AM and PM peak hours. Therefore, further LOS analysis does not appear to be warranted based on the County's TA Guidelines.

Impacts to Other Transportation Modes

Pedestrian: Existing pedestrian facilities in the immediate Project area are limited to a sidewalk on the south side of Dillon Road along the frontage of the existing Desert Self Storage property. These improvements will be continued west as part of the proposed Project along the frontage of the RV self-storage property. Future sidewalks are planned along Wolven Street and Beacon Way at the southern and western boundaries of the Project site, respectively, and will be constructed when future street improvements occur.

Bicycles and Transit Service: There would not be any impact to the existing Class II bicycle lanes and SunLine Transit Route in the Project vicinity. The closest bus stops are located 0.25 miles east along Palm Drive at the Dillon Road intersection. There is no bus service along Dillon Road. SunLine periodically reviews and updates its services and facilities based on ridership, budget, and community demand. The Project would have no impact on plans or policies addressing transit facilities.

Summary
Based on the traffic analysis above, the proposed Project would generate up to 37 daily vehicle trips. The LOS at the Palm Drive and Dillon Road intersection is projected to operate at unacceptable levels at General Plan buildout (2040); however, these impacts were previously considered as part of the General Plan Update EIR and statement of overriding considerations were adopted by the City. The Project would not worsen impacts at this intersection. The project would also be required to include sidewalk improvements along Dillon Road. Overall, impacts will be less than significant.

b) **Less than Significant Impact** Pursuant to Senate Bill 743 (SB 743), CEQA Guidelines were amended to require all lead agencies to adopt vehicle miles traveled (VMT) as a replacement for automobile delay-based level of service (LOS) for identifying transportation impacts for land use projects. This statewide mandate went into effect July 1, 2020.

The County's TA Guidelines also establish evaluation criteria for VMT analysis based on guidance from the Office of Planning and Research's (OPR) Technical Advisory on Evaluating Transportation Impacts in CEQA (State of California, December 2018). The County's TA Guidelines identify screening criteria for certain types of projects that typically reduce VMT and may be presumed to result in a less than significant VMT impact. They are as follows:

- Small Projects (generate less greenhouse gas emissions than threshold criteria)
- Projects near High Quality Transit
- Local Servicing Retail
- Affordable Housing
- Local Essential Service

- Map Based Screening
- Redevelopment Projects

To qualify for screening, a project needs to fulfill only one of the screening types listed. The Project is considered a "small project." This applies to projects with low trip generation per existing CEQA exemptions or based on the County Greenhouse Gas Emissions Screening Tables, which identify projects that result in less than the 3,000 Metric Tons of Carbon Dioxide Equivalent (MT CO2e) per year screening level threshold. The County used the California Emissions Estimator Model (CalEEMod) to determine the maximum number of dwelling units or square footage for a variety of land uses that would remain within the 3,000 MT CO2e per year threshold established by the South Coast Air Quality Management Districts (SCAQMD). Additional documentation is contained in Appendix G of the County's TA Guidelines.

As established by the County of Riverside, the following land use quantities are considered "small projects" that may be presumed to result in a less than significant VMT impact:

- Single Family Housing projects less than or equal to 110 Dwelling Units; or
- Multi Family (low rise) Housing projects less than or equal to 147 Dwelling Units; or
- Multi Family (mid-rise) Housing projects less than or equal to 194 Dwelling Units; or
- General Office Building with area less than or equal to 165,000 SF; or
- Retail buildings with area less than or equal to 60,000 SF; or
- Warehouse (unrefrigerated) buildings with area less than or equal to 208,000 SF; or
- General Light Industrial buildings with area less than or equal to 179,000 SF
- Project GHG emissions less than 3,000 Metric Tons of Carbon Dioxide Equivalent (MTCO2e) as determined by a methodology acceptable to the Transportation Department; or
- Unless specified above, project trip generation is less than 110 trips per day per the ITE Trip Generation Manual or other acceptable source determined by Riverside County.

According to the traffic analysis herein, the proposed storage facility is forecast to generate fewer than 110 daily trips. Therefore, it is reasonable to presume the proposed project would result in a less than significant VMT impact since it is forecast to generate fewer daily trips than comparable land uses that satisfy the County-established screening criteria for small projects. Therefore, the Project meets the Small Projects screening threshold of the County VMT guidelines and can be determined to have less than significant impacts on circulation. The Project will not conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b).

c) **No Impact.** The Project is proposed to have access from Dillon Drive. Roadway improvements will be constructed in compliance with City standards and will not cause significant traffic delays or increased traffic hazards. No sharp curves, dangerous intersections, or hazardous geometric features are proposed. The Project vehicle mix will be consistent with the existing mix in the Project area. Construction plans will be coordinated with the city so that construction activity does not interfere with traffic on adjacent and nearby roads.

d) **No Impact.** The main driveway serves as an emergency access route. Prior to construction, the Fire and Police Departments will review the site plan to ensure safety measures are addressed, including emergency access and vehicle turnaround space. Construction plans will be coordinated with the city and emergency providers, as needed, to assure that emergency access is maintained throughout all stages of development. No impact will occur.

Mitigation Measures: None

Monitoring: None

XVIII. TRIBAL CULTURAL RESOURCES Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Would the Project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or		✓		
ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.		✓		

Source: Desert Hot Springs General Plan Update, 2020. "Historical/Archaeological Resources Survey Report for Desert RV Storage Project," prepared by CRM TECH on January 29, 2023.

Environmental Setting

As discussed under Section V, Cultural Resources, the oldest cultural resources reported in the City of Desert Hot Springs are from the "Paleo-Indian Period" which dates back to at least 11,000 B.C., which probably occur in the vicinity of fault-related mesquite and palms, as well as resources associated with mountain washes, streams and canyons.

Discussion of Impacts

a i, ii) **Less Than Significant Impact with Mitigation Incorporated.** Based on the CRM TECH findings, no historical or archaeological resource is known to occur at the project site's surface. However, the site is within the ACBCI Tribe's aboriginal territory or traditional land use area and potentially contains sub-surface archaeological resources. Therefore, mitigation measures and a monitoring program are included in Section V (Cultural Resources) to reduce potential impacts to less than significant levels, consistent with the concerns of the ACBCI.

The City conducted Tribal Consultation in conformance with both SB 18 and AB 52 requirements and contacted 14 tribes in writing in a letter dated May 30, 2023. The letter from the City indicated that all Tribes had 90 days from the date of the letter to request consultation in writing regarding the proposed Project. As of July 17, 2023, two tribes have formally responded in writing, including the Agua Caliente Band of Cahuilla Indians and the Yuhaaviatam of San Manuel Nation (formerly known as the San Manual Band of Mission Indians) (Appendix E Tribal Consultation).

The Agua Caliente Band of Cahuilla Indians (ACBCI) responded in a letter dated June 5, 2023 indicating that the site is within the Tribe's Traditional Use Area and requested the following:

- Copies of any cultural resource documentation (report and site records) generated in connection with this project.
- A copy of the records search with associated survey reports and site records from the information center.
- A copy of the Mitigated Negative Declaration report.
- The presence of an approved Agua Caliente Native American Cultural Resource Monitor(s) during any ground disturbing activities (including archaeological testing and surveys). Should buried cultural deposits be encountered, the Monitor may request that destructive construction halt and the Monitor shall notify a Qualified Archaeologist (Secretary of the Interior's Standards and Guidelines) to investigate and, if necessary, prepare a mitigation plan for submission to the State Historic Preservation Officer and the Agua Caliente Tribal Historic Preservation Office.
- Formal government to government consultation under California Senate Bill 18
- Formal government to government consultation under California Assembly Bill No. 52 (AB-52).

After review of the Mitigated Negative Declaration, ACBCI responded in a follow-up letter dated July 13, 2023, indicating that the concerns of the Tribe have been addressed and proper mitigation measures were provided in the ISMND (CUL-1), and that AB 52 and SB 18 consultation efforts have been concluded.

The Yuhaaviatam of San Manuel Nation (YSMN) responded in an email dated June 13, 2023, indicating that the Project is located outside the Serrano ancestral territory and, as such, the (YSMN) did not request further consultation.

If additional Tribes request Tribal consultation before the close of the 90 day request window indicated in the notification letter, which is August 29, 2023, the results of consultation will be included either as mitigation prior to the adoption of the Initial Study, or as conditions of approval. However, the mitigation measure included in Section V, Cultural Resources, requires that an archaeologist and/or Tribal monitor be consulted should any resources be identified during grading, to assure that impacts are reduced to less than significant levels. Should a consulting tribe request additional mitigation, it will be added to this Initial Study or to conditions of approval for the Project.

Mitigation Measures:
See Section V, Cultural Resources.

Monitoring:
See Section V, Cultural Resources.

XIX. UTILITIES AND SERVICE SYSTEMS Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?			✓	
b) Have sufficient water supplies available to serve the Project and 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?			✓	

Source: Desert Hot Springs General Plan Update, 2020; CalRecycle.

Environmental Setting

Wastewater Treatment

The Coachella Valley Water District (CVWD) also provides sewer service to portions of the City of Desert Ho Springs, including the project area. The Project will extend sewer lines from an existing 15-inch sewer main in Dillion Road in the project vicinity.

CVWD maintains sewer trunk lines ranging in size from 4 to 24 inches and five sewer lift stations in City boundaries. CVWD operates five WRPs, two of which (WRP-7 and WRP-10) generate recycled water for irrigation of golf courses and large landscaped areas. Effluent from the City is conveyed to CVWD's Cook Street treatment plant (Water Reclamation Plant No. 10), which has a total capacity of 18 million gallons per day (mgd), including 15 mgd tertiary treatment capacity. CVWD also implements the requirements of the Regional Water Quality Control Board pertaining to domestic water quality and wastewater discharge.

Domestic Water

The Project site is within the Coachella Valley Water District (CVWD) service area for domestic water. Its primary water source is groundwater extracted through a system of wells from the Whitewater River subbasin. In addition to groundwater, CVWD relies on imported water brought to the region by canals. CVWD's domestic water system includes 97 wells with a total daily pumping capacity of 244 million gallons. CVWD has a total of 64 reservoirs, with an average storage capacity of 153.2 million gallons. CVWD also owns and operates the water distribution system, which is generally located under existing streets in the public right-of-way. There are existing 12-inch water lines within Dillon Road in the project vicinity.

CVWD is responsible, under the California Water Code, for analyzing its current and future water supply and assuring that sufficient supply is available to serve land uses within the District, through the preparation of an Urban Water Management Plan (UWMP). CVWD is required to periodically update the Plan.

Storm Water Management
The project site is located in the northern portion of the Coachella Valley. A network of natural and improved streams, storm drains, storm channels, and catch basins form the storm water drainage infrastructure within the City. The City implements standard requirements for the retention of storm flows, and participates in the National Pollution Discharge Elimination System (NPDES) to protect surface waters from pollution. Development projects must retain the 100-year storm flow on site. Please also see Section X, Hydrology and Water Resources.

Solid Waste
Solid waste disposal services are provided by Desert Valley Disposal, Inc. (DVD), whose services include complete residential, commercial and roll-off trash disposal. Trash and recycled materials are collected from customers in the City and transported to the Lamb Canyon landfill, located at 16411 Lamb Canyon Road, Beaumont. Lambs Canyon is operated by the County of Riverside.

Discussion of Impacts

a-c) Less Than Significant Impact.

Water
The proposed project will be connected to the existing domestic water pipelines in the Dillon Road ROW, and thus will not require the relocation of facilities. As shown in Table 6 in Section X, Hydrology and Water Quality, the total projected water demand for the Project is 2.03 acre-feet per year (AFY). This accounts for 0.001% of the CVWD's total planned increases in demand of 164,966 AFY by 2045.

In developing projections for future water demand, the CVWD partially bases its analysis on the City's General Plan. The proposed uses are consistent with the commercial and residential land uses in the General Plan, and thus its impacts to water demand can be expected to be accounted for in the CVWD's projections. Additionally, the Project will be required to implement all water conservation measures imposed by the CVWD for normal and drought conditions.

In conclusion, the Project's impacts related to domestic water demand are anticipated to be less than significant.

Wastewater Treatment
The project area is currently served by CVWD wastewater services. The project will connect to these utility service networks and, other than parcel-level connections, will not require the construction or expansion of additional facilities because the proposed project will not significantly increase demand for services. Impacts will be less than significant.

The CVWD is subject to wastewater treatment standards established by the Regional Water Quality Control Board. All components of the proposed project will be required to design facilities consistent with CVWD and Regional Board standards. This will assure that impacts associated with wastewater treatment will be less than significant.

Drainage System
Christiansen & Company prepared a Preliminary Hydrology Study for the project site in May 2023. According to the drainage report, on-site retention for the 100-year, 24-hour storm event will be provided, as per the City of Desert Hot Springs requirements. Onsite drainage facilities will consist

of valley gutters (inverted section), one 36"'x36" grate inlet, 72" Contech CMP perforated Pipe Underground Storage Chamber and proposed retention basin. The Contech Chamber shall have a total capacity of 5044 cf. Once capacity has been met in the chamber the overflow shall traverse to the onsite retention basin (25880 cf) via a 24" HDPE Storm Drainpipe. The proposed site shall contain 100% of the critical 100 yr storm event.

The Project will implement standard Best Management Practices (BMP) through the preparation of a Water Quality Management Plan (WQMP) to reduce pollutants of concern and reduce any project-related impacts to water quality, as required by the City in order to comply with the National Pollutant Discharge Elimination System (NPDES). Project-related impacts to stormwater drainage will be less than significant.

Electricity
The Project connect to the existing SCE infrastructure in the Project area. The project will not require the addition or expansion of electric power facilities.

Natural Gas
Natural gas will be provided to the Project by Southern California Gas (SoCalGas). The project will connect to existing SoCalGas infrastructure in the project area. The project will not require the addition or expansion of natural gas facilities.

Telecommunications
The project will provide local connections to the existing Frontier Communications infrastructure in the project area. The project will not require to the addition or expansion of telecommunication facilities.

d, e) **Less Than Significant Impact**. Solid waste transported by both public and private haulers is either recycled, reused, or transferred at a waste-to-energy facility, or disposed of at a closest landfill, Lamb Canyon landfill by Desert Valley Disposal, Inc. The Lamb Canyon Landfill has a permitted capacity of 39,681,513 cubic yards, with a maximum disposal capacity of 5,000 tons per day.

Table 8
Estimated Solid Waste Disposal at the Project Buildout

Land Use	Disposal Rate*	Proposed	Solid Waste Disposal (pounds per day)	Solid Waste Disposal (tons per year)
Single Family Residential	12 lbs/household/day	1 unit	12	2.19
			TOTAL (with 50% diversion)	1.095
*Estimated Solid Waste Generation Rates by Calrecycle,				

As shown in Table 8, the Project is estimated to generate 1.095 tons of solid waste per year, which is less than 0.000002% of the County's remaining capacity. Desert Valley Disposal, Inc. is responsible for maintaining standards that assure that all waste is handled in a manner that meets local, state and federal standards. These requirements will assure that impacts associated with solid waste disposal remain less than significant.

Mitigation Measures:
None required.

Monitoring:
None required.

XX. WILDFIRE If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, W**ould the project:**	**Potentially Significant Impact**	**Less Than Significant with Mitigation Incorporated**	**Less Than Significant Impact**	**No Impact**
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?				✓
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?				✓
c) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?				✓
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?				✓

Source: Desert Hot Springs General Plan Update, 2020.

Environmental Setting

Large areas of California are at risk of fires due to the weather, topography, and native vegetation. It continues to experience longer and more severe wildfire seasons, in part as a result of climate change and fire suppression techniques.

The California Department of Forestry and Fire Protection (CalFire) prepares maps that identify state responsibility areas (SRA), local responsibility areas (LRA), and Very High Fire Hazard Severity Zones (VHFHSZ). These maps show that the majority of Thousand Palms is in local responsibility areas and outside fire hazard zones. According to the City's General Plan Update Figure SN-5, Wildfire Hazards, the Project area is not within or near any locally or state designated fire hazard zones or SRAs. In addition to the City's implementation of the California Fire Code, development standards from the Riverside County Fire Department (RCFD) also apply. These standards are implemented through the review of development proposals by the RCFD in coordination with review by City staff.

Discussion of Impacts

a) No Impact. The primary emergency evacuation routes in the project vicinity include Interstate 10, Palm Drive, and Dillon Road. The project site is located in proximity to Palm Drive and Dillon Road, which provides regional access in an emergency. Development on the subject property would not substantially impair the City's adopted emergency evacuation and response plans as the project is not proposing to amend these routes to impede emergency evacuation. No impact is anticipated.

b) **No Impact.** The project area is not located within a wildfire hazard severity zone nor a wildland-urban interface (WUI). The project site is miles from an area of wildland fire potential. Project occupants may experience decreases in air quality as a result of wildfires in the region, however, due to the project site's distance from state responsibility areas or lands classified as very high fire hazard severity zones. No impact is anticipated.

c) **No Impact.** The project will not require the installation or maintenance of associated infrastructure that could exacerbate fire risk or that may result in temporary or ongoing impacts to the environment. No impact is anticipated.

d) **No Impact**. The project site is located on a relatively flat area on the floor of the Coachella Valley where there is no potential for landslide, or post-fire slope instability. The proposed project would not expose people or structures to significant risks such as downslope or downstream flooding or landslides, post-fire slope instability, or drainage changes. No impact is anticipated.

Mitigation Measures: None required.

Monitoring: None required.

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

Discussion of Impacts

a) Less Than Significant Impact with Mitigation Incorporated:

Biological Resources

The project site is an undeveloped land which is sparsely covered by native plant species which could provide habitat for nesting birds. Therefore, a pre-construction survey will be required to avoid impacts to nesting birds covered by the MBTA.

The proposed project will not significantly reduce fish or wildlife habitat or otherwise adversely impact a fish or wildlife species. The construction of the project has the potential to impact nesting birds, but the mitigation measures included in this document will reduce those impacts to less than significant levels.

The project site is located within the boundaries of a CVMSHCP jurisdiction but not within a designated conservation area and does not contain any wildlife corridors or biological linkage areas. The project is required to adhere to the Land Use Adjacency Guidelines of the CVMSHCP because it is located immediately adjacent to the Willow Hole Conservation Area and Upper Mission Creek/Big Morongo Canyon Conservation Area. The site is subject to payment of the Development Mitigation Fee to mitigate potential impacts to covered species under the CVMSHCP.

Cultural Resources

The project site does not contain any historical or archaeological resource which could show major periods of California history or prehistory. Nonetheless, an archeologist and Tribal monitor shall be on site during pre-construction phases, including all earth moving activities to ensure potential impacts to archeological or tribal resources are mitigated to less than significant levels.

b) **Less Than Significant Impact**. A significant impact could occur if the proposed project, in conjunction with related projects, would result in impacts that would be less than significant when viewed separately, but would be significant when viewed together. The impacts of the proposed project are individually limited and not cumulatively considerable. When viewed in conjunction with other closely related past, present or reasonably foreseeable future projects, cumulative impacts would not be significant.

c) **Less Than Significant Impact**. This project is not anticipated to have any environmental effects which would cause substantial adverse effects on human beings, either directly or indirectly, with the implementation of the City's Municipal Code and other standard requirements and requirements of law. All potential impacts are expected to remain at less than significant levels.