PALM SPRINGS FULFILLMENT CENTER

DRAFT EIR

SCH #2023080091

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Along with a list of EIR prepares, a list of public agencies, organizations and persons consulted for the EIR is included below, compliant with CEQA Guidelines Section 15129. The following list includes agencies that responded to the Notice of Preparation (NOP) or commented on the DEIR (listed in alphabetical order).

- California Department of Fish and Wildlife (CDFW)
- Native American Heritage Commission (NAHC)

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Chapter 1.0 Executive Summary

1.1 Overview of the Executive Summary

This chapter has been prepared pursuant to Section 15123 of the California Environmental Quality Act (CEQA) Guidelines, which states that an Environmental Impact Report (EIR) Executive Summary shall: 1) contain a brief summary of the proposed action; 2) identify each significant effect with proposed mitigation measures that would reduce or avoid that effect; 3) identify alternatives that were designed to reduce or avoid identified significant effects; 4) identify areas of controversy known to the Lead Agency including issues raised by agencies and the public; and, 5) identify issues to be resolved including the choice among alternatives and whether or how to mitigate the significant effects.

1.2 Summary of the Proposed Action

1.2.1 Proposed Project

Existing Conditions

The project site encompasses approximately 38 acres north of 19th Avenue and west of Indian Canyon Drive in the City of Palm Springs. The existing local area is characterized by vacant land to the north, vacant property and wind turbines to the west, commercial businesses to the south, and an industrial business park to the east. In its existing condition, the property is characterized primarily as undeveloped and relatively level, with uniform sandy terrain and scattered vegetation. Soil disturbance and vehicle tracks are indicative of recent activity onsite. The southern and eastern property boundaries are bordered by 19th Avenue and Indian Canyon Drive, respectively, while the western property boundary is delineated by chain-link fencing.

The project property is within the City of Palm Springs's Industrial land use designation with a Wind Energy Overlay and Manufacturing (M-2) zoning designation. Industrial land use designations within Palm Springs allow research and development parks, light manufacturing, laboratories, and industrial services. Properties north and west of the project are also located within City's Industrial designation; properties south of the project are located in the City's Regional Business Center land use designation, while properties east of the project are located within the City of Desert Hot Springs, whose General Plan designates lands to the east as Coachillin Specific Plan (SP).

Proposed Project

The project proposes the development of a two-story, 739,360-square-foot fulfillment center. The proposed fulfillment center is compliant with the existing land use and zoning designations established by the City of Palm Springs; therefore, the project does not propose changes in existing land use and zoning designations.

The proposed 739,360-square-foot building will be two stories, with 727,360 square feet designated for industrial uses, and 12,000 square feet for office spaces. Project implementation will also include the development of associated infrastructure such as paved drive aisles and parking areas, as well as landscape and retention areas. The proposed project's land use areas are provided in **Table 1-1, *Proposed Project Areas***, below.

Table 1-1 Proposed Project Areas

Land Use	Square Foot *	Acreage	Percentage
Existing Gross Acreage	1,722,174	39.54	--
Proposed Right of Way Dedication (Indian Canyon Drive & 19th Avenue)	144,550	3.32	--
Proposed Net Acreage	1,577,624	36.22	100%
Proposed Building Area (Ground Floor Area) *	727,360	16.70	46%
Access Roads, Hardscape & Parking	669,389	15.37	42%
Landscape & Retention Areas	180,875	4.15	12%
Off-Site Sewer**	6,534	0.15	--

* Total Building Area indicated above, does not include second story acreage of offices

**650 feet of sewer with 10-foot wide trench.

1.2.2 Implementing Actions / Other Approvals Associated with the Proposed Project

Pursuant to CEQA Guidelines Section 15367, the City of Palm Springs is the Lead Agency and has discretionary authority over the project. This EIR has been prepared as a Project EIR that will be used by the City as part of its consideration of all components of the project. Other responsible or trustee agencies may also use the EIR in their consideration of permitting of development within the project site. These include but are not limited to the South Coast Air Quality Management District (SCAQMD), and the Regional Water Quality Control Board (RWQCB).

The City has the principal approval authority over the proposed project. The applicant is requesting a Major Development Permit as a part of the entitlement process. A brief summary of the Major Development Permit is provided below, and an in-depth discussion of the project's entitlement is in **Chapter 3.0, *Project Description***.

- **Major Development Permit:** A Major Development Permit is required for new multifamily, commercial, and industrial buildings. The review process is conducted to ensure that a

proposed development is in conformance with the standards and guidelines established by the General Plan, the Zoning Ordinance, and the various City departments, including Planning, Public Works, and Building. The process is intended to result in well-designed site plans and properly built projects.

In addition, the proposed project will require approval of the following plans:

- State Water Resources Control Board Colorado River Basin Region (Region 7)
  - Construction Stormwater General Permit, Notice of Intent to Comply with Section 402 of the Clean Water Act.
  - Construction Stormwater Pollution Prevention Plan (SWPPP).
- South Coast Air Quality Management District
  - PM-10 Plan for compliance with Rule 403, Fugitive Dust, and 403.1, Fugitive Dust in the Coachella Valley.
  - Any applicable air quality permits associated with fulfillment center industrial uses, such as:
    - Permit to Construct (SCAQMD Rule 201), as applicable.
    - Permit to Operate (SCAQMD Rule 201), as applicable.
    - Form 400-A, as applicable.

1.3 Alternatives to the Proposed Project

This EIR has considered and evaluated alternatives to the proposed project pursuant to the provisions of Section 15126.6 of the State CEQA Guidelines, as amended. Section 15126.6(a) of the State CEQA Guidelines states that:

> *"An EIR shall describe a range of reasonable alternatives to the project, or the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation. There is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason."*

The range of alternatives evaluated in an EIR is governed by the "rule of reason" that requires evaluation of only those alternatives necessary to permit a reasoned choice. An EIR need not consider an alternative whose effects cannot be reasonably ascertained and whose implementation is remote and speculative.

1.3.1 Alternatives Considered for Evaluation

Three alternatives to the Palm Springs Fulfillment Center project were considered for evaluation and compared to the proposed project. The following provides a summary of the Alternatives. Analysis of

the impacts associated with each Alternative is provided in **Chapter 7.0, *Alternatives,*** of this Draft EIR. The alternatives considered are intended to provide options to potentially reduce project-related significant impacts. As determined in this Draft EIR and various technical studies performed for the project, the proposed project would result in significant impacts associated with greenhouse gas emissions and traffic/vehicle miles traveled during operation of the fulfillment center. The alternatives analyzed in Section 7 have been selected to consider whether they would feasibly reduce project impacts, while meeting project objectives.

Alternative 1: No Project

According to CEQA Guidelines Section 15126.6 (e) the analysis of alternatives must include the "No Project" alternative. The purpose of describing and analyzing a No Project alternative is to allow decision makers to compare the impacts of approving the proposed project with the impacts of not approving the proposed project. Under the No Project Alternative ("Alternative 1"), the project site would remain in its existing vacant condition.

Alternative 2: Reduced Density Project

Under this Alternative, the project would develop a reduced density industrial project. Alternative 2 would reduce the size of the industrial building by half. Therefore, this Alternative would reduce the building footprint by 50 percent, for a maximum of 369,680 square feet. Under this Alternative, the land use would remain a distribution facility, with access points on both Indian Canyon and 19th Avenue in a configuration similar to that of the proposed project. This Alternative would reduce the development and operational area, including the number of employees thus reducing the traffic generated from this Alternative. The Alternative would require a Major Development Permit approval, similar to the proposed project.

Alternative 3: Industrial Business Park

Under the M-2 Zoning Development Alternative, the property would be built as a typical industrial business park development within the M-2 zoning designation established by the City of Palm Springs. According to Section 92.17.1.01 of the Palm Springs Municipal Code uses permitted within M-2 zones could include adult oriented business; animal day care; animal hospitals, including kennels; cannabis lounge or dispensary; fabrication (i.e., manufactured housing, fencing, cans and containers, vehicle parts); manufacturing (i.e., compounding processing, packaging or treatment of products, saw and planing mills, stone cutting and related activities); cannabis transportation and distribution facility; equipment sales, rental and storage; and wholesale, warehouse, distribution, fulfillment, and import/export centers.

Alternative 3 proposes to develop a 182,000-square-foot self-storage facility on 7-acres, a 26,000-square-foot vehicle storage and rental facility (i.e., U-Haul) on 1 acre, two 26,000-square-foot manufacturing buildings (i.e., stone cutting, lighting and wiring) on 2 acres, two 26,000-square-foot buildings for equipment sales on 2 acres, and two 274,000-square-foot wholesale, warehouse,

distribution, fulfillment, and import/export centers on 21 acres. It is estimated that open space areas for retention, irrigation ditches and landscaping would take up 5 acres of the project site. The buildings proposed in Alternative 3 would conform to the Municipal Code, Section 92.17.1 for setbacks, heights, parking, etc. Access to the site would be at similar locations as the proposed project (i.e., one on 19th Avenue for truck access, and two on Indian Canyon Drive for non-truck access). The uses are summarized in the table below.

Table 1-2 Alternative 3 Land Use Summary

Use	Acres	Building Area (Square Feet)
Storage Facility	7	182,000
Vehicle Rental and Storage	1	26,000
Manufacturing Use Building 1	1	26,000
Manufacturing Use Building 2	1	26,000
Equipment Sales Building 1	1	26,000
Equipment Sales Building 2	1	26,000
Warehouse/Distribution/ Fulfillment 1	10.5	274,000
Warehouse/Distribution/ Fulfillment 2	10.5	274,000
Landscape	5	--
Total	38	860,000

A full discussion and analysis of the alternatives compared to the proposed project is included in **Chapter 7.0, *Alternatives***. **Table 7-9, *Comparison of Alternatives and Project*,** in **Chapter 7.0,** provides a summary comparison of impacts associated with the project alternatives.

1.3.2 Alternatives Considered and Rejected

State CEQA Guidelines Section 15126.6(c) requires an EIR to identify any alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process, and to briefly explain the reasons underlying the agency's determination. Additionally, alternatives may be eliminated from detailed consideration in the EIR if they fail to meet most of the project objectives, or do not avoid any significant environmental effects. This section identifies the alternative considered but rejected as infeasible.

CEQA Guidelines require examination of an alternative location for the project if such locations would result in the avoidance of or lessening of significant impacts. The location of the property, with surrounding vacant land and commercial and industrial uses in proximity to the I-10 freeway, a major commerce corridor, provides a unique location for the proposed use. In addition to the foregoing, the property owner does not own or control any other suitable properties in the area, and was unable to identify an alternative location that is available for purchase and that would substantially reduce any

of the significant impacts of the proposed project; therefore, the relocation of the proposed project is not considered as a feasible alternative.

Additional alternatives considered and rejected include the operation of a storage facility, solar farm, or wind energy convection system (WECS) on the project site. The development of a storage facility, solar farm, or wind energy convection system would reduce trips (traffic) and greenhouse gas emissions impacts because the operation of these facilities typically includes minimal vehicle trips. This is due to the limited employees required to operate these facilities during operation. The storage facility would also include infrequent trips to the facility from clients visiting their storage space. Although storage facilities are allowed within M-2 zones, this alternative was rejected because of the size of the project. The 38-acre site would be too large for a storage facility, which typically occupies up to 10 acres. For example, the storage facility south of the project sits on an approximately 5-acre site. Operation of the solar farm or WECS was rejected due to the project's immediate adjacency to Indian Canyon Drive, since the City does not allow these uses along a major right-of-way, such as Indian Canyon Drive.

Moreover, the storage facility, solar farm, or WECS would not meet the project's objectives to promote quality development consistent with the goals and policies of the Palm Springs General Plan; develop a state-of-the-art industrial fulfillment center in the Industrial land use are in Palm Springs that is consistent in use and look with the existing developments in the surrounding areas; provide employment opportunity and growth in the City's Industrial land use designation north of the Interstate 10 freeway; or create a project that takes advantage of existing infrastructure, including the proximity to major regional roadways, such as Interstate 10, and other similar infrastructure.

See **Chapter 7.0, *Alternatives,*** for additional analysis regarding the alternatives considered and rejected.

1.4 Areas of Controversy/Issues to be Resolved

Comments received during the circulation period of the Notice of Preparation (NOP) did not identify concerns regarding the project, therefore there are no specific areas of controversy to be resolved.

1.5 Mitigation Monitoring and Reporting Program

Pursuant to Section 21081.6 of the California Public Resources Code and the California Environmental Quality Act (CEQA) Guidelines Section 15097, public agencies are required to adopt a monitoring and reporting program (MMRP) to ensure compliance with mitigation measures during project. The MMRP must be adopted when a public agency makes it findings with respect to each significant effect before approving or carrying out a project for which an EIR has been certified (California Public Resources Code Section 21081(a); CEQA Guidelines Section 15091).

Table 1-3 identifies the potentially significant effects of the proposed project, mitigation measures, identified to avoid or reduce the identified potentially significant effects to the maximum extent feasible, and the effectiveness of the mitigation measures to reduce the potentially significant effects to a level of less than significant.

Table 1-3 Mitigation Monitoring and Reporting Program

Potential Impacts on the Environment	Mitigation Measure	Responsible for Monitoring	Timing	Level of Significance after Mitigation
4.1 Aesthetics				
a. Adverse effect on scenic vistas (LTS) b. Impact a Scenic Highway (LTS) c. Degradation to the visual character or quality of the site (LTS) d. Light and glare (LTS)	None required	N/A	N/A	Less than Significant
4.2 Air Quality				
a. Conflict with implementation of applicable air quality plan (LTS) b. Cumulatively considerable net increase if any criteria pollutant (LTS) c. Expose sensitive receptors to substantial pollutant concentrations (LTS) e. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people (LTS)	None required	N/A	N/A	Less than Significant
4.3 Biological Resources				
a. Candidate, sensitive or special status species (SI) b. Riparian habitat (NI)	**BIO-1** Per the 2012, California Department of Fish and Wildlife (CDFW) Staff Report on Burrowing Owl Mitigation, a burrowing owl clearance survey shall be performed by a qualified biologist 14 to 30 days prior to any site disturbance (grubbing, grading, and construction). The pre-construction survey is required to use	Qualified Biologist City Planning Department	Prior to ground disturbing activities	Less than Significant

c. Federally protected wetlands (NI) d. Movement of wildlife (SI) e. Conflict with local policies (NI) f. Conflict with applicable habitat conservation plan (SI)	accepted protocol (CDFW Staff Report). A final clearance survey must be conducted 24 hours prior to ground disturbance. If owls are found to be present during the breeding season (February 15 through September 15), a qualified biologist will prepare a plan and submit it to CDFW for review and approval prior to establishing a buffer area (a no disturbance zone) around the active burrow. When it is determined that all young owls have permanently left the burrow (fledged), the buffer area may be abandoned, and the adult owls captured and relocated, if approved under the plan. If the presence of any burrowing owl is confirmed in preconstruction surveys, regardless of season, a qualified biologist shall prepare a plan for avoidance or relocation and submit it to the CDFW for review and approval. No construction activity shall be permitted until the measures contained in the approved plan have been completed. **BIO-2** For any 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, 24 hours prior to initiation of project-related ground disturbing activities. If nesting birds are present, no work shall be permitted near the nest 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. **BIO-3** The project applicant will pay the Local Development Mitigation Fee (LDMF). The payment of this fee will mitigate impact to species on the project site that are covered under the CVMSHCP to a less than significant level.	Project Applicant/ Developer		

4.4 Cultural Resources				
a. Adverse change to Historical Resources (LTS) b. Adverse change to Archaeological Resources (SI) c. Disturb any human remains, including those interred outside of formal cemeteries (LTS)	**CUL-1** Prior to ground disturbance (including clearing, grubbing, etc.) the applicant/developer will retain a qualified archaeological monitor and an ACBCI Tribal monitor to be present during all ground disturbing activities. If cultural materials are discovered during grading or excavation, the construction contractor shall cease all earthmoving activity within and around the immediate discovery area until a qualified archaeologist can assess the nature and significance of the find. An archaeological monitoring plan will be developed and implemented to ensure that any unanticipated discoveries made during project-related ground-disturbing activities are properly treated. The archaeologist, in consultation with ACBCI, shall be consulted to reduce or terminate monitoring when it is indicated by field conditions and as appropriate.	Qualified Archaeologist City Planning Department Project Applicant/ Developer	Prior to ground disturbance	Less than Significant
4.5 Energy				
a. Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation? (LTS) b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency? (LTS)	None required	N/A	N/A	Less than Significant
4.6 Geology and Soils				

a. Expose people or structures to potential substantial adverse effects involving: i. Rupture (NI) ii. Strong Seismic Shaking (SI) iii. Seismic-related ground failure, including liquefaction (SI) iv. Landslides (LTS) b. Substantial Soil Erosion or loss of topsoil (SI) c. Located on an Unstable Geologic Unit (SI) d. Located on Expansive Soil (SI) e. Inadequate soils to support septic tanks (NI)	**GEO-1** The project shall comply with all the grading and excavation codes of the County of Riverside and shall be in compliance with all applicable provisions of the 2022 California Building Code (2022 CBC). The project shall also be in accordance with the project-specific Geotechnical Investigation for the submittal of grading and building plans. **GEO-2** Clearing operations shall include the removal of any trash, debris, vegetation, and similar deleterious materials including the root balls of any trees. Voids created by the removal shall be backfilled as well as the removal and replacement of surficial artificial and compressible soil materials with engineered fill. Any buried deleterious materials encountered within the site due to past site usage may need to be removed by hand (e.g., root pickers) during grading operations. **GEO-3** Any existing undocumented fill and near surface native soils are considered unsuitable for support of proposed structures and shall be removed to underlying competent alluvial materials as approved by the project geotechnical consultant. The estimated depth of removal is recommended to be approximately 6 feet below the existing ground surface in proposed building areas. Consideration shall be given to locally deepening the excavation at the location of tree roots or proposed subterranean features (if any) in order to provide a uniform depth of compacted fill in all areas. Soil removals could be locally deeper depending upon the actual exposed conditions encountered during grading. At a minimum, the over-excavation shall extend a distance beyond the perimeter of the structure equal to the depth of the over-excavation. The actual depths and horizontal limits of removals and over-excavations shall be evaluated upon availability of the	Qualified Soils Engineer City Planning, Engineering & Public Works Department Project Applicant/ Developer	During ground disturbing activities	Less than Significant

	site grading plan and during grading on the basis of observations and testing performed by the project geotechnical consultant. Excavated soils, if free of deleterious materials, are considered acceptable for use as compacted fill. **GEO-4** Prior to placing engineered fill, the exposed bottom surfaces in the removal areas shall be approved by a representative of project geotechnical consultant. The exposed bottom(s) shall be scarified to a minimum depth of 12 inches, moisture-conditioned or air-dried to achieve approximately two percent above optimum moisture content and then compacted with a heavy construction equipment prior to placement of fill. Minimum compaction of the upper 12 inches of the removal bottom shall meet or exceed 90 percent relative compaction. The laboratory maximum dry density, the standard for determining relative compaction, and optimum moisture content for each change in soil type shall be determined in accordance with Test Method ASTM D 1557. **GEO-5** If remedial grading is necessary immediately adjacent to the property boundaries, a geotechnical consultant must prepare a plan addressing issues including as follows: temporary backcut slopes shall generally be restricted to a slope ratio of 1:1 (h:v) or flatter to protect adjacent offsite improvements (including pavement, sidewalks, walls, buried utilities, etc.). Depending on the actual horizontal extent of necessary remedial grading, a wedge of unsuitable soil may remain in place along the site perimeter that will extend into the site. Any new perimeter site improvements that are anticipated to be within this zone may need to be designed and constructed with deepened and/or strengthened foundation systems designed to withstand relative			

	movement that is likely to result from settlement of these likely compressible surficial soils. Alternately, the remedial grading adjacent to the site boundaries may be accomplished by the slot-cutting method. More specific recommendations may be appropriate once the rough grading plan is available for review. **GEO-6** All fill materials shall be placed in approximately 6- to 8-inch-thick loose lifts, watered or air-dried as necessary to achieve a minimum moisture content at least 2 percent above the optimum moisture condition, and then compacted in-place to a minimum relative compaction of 90 percent. The laboratory maximum dry density and optimum moisture content for each change in soil type shall be determined in accordance with ASTM D 1557. **GEO-7** Prior to the start of earthwork, a meeting shall be held at the site with the owner's representative, contractor, and geotechnical consultant to discuss the work schedule and geotechnical aspects of the grading. Earthwork, which in this instance will generally entail removal and re-compaction of the near surface soils, shall be accomplished under full-time observation and testing by the geotechnical consultant. A representative of the project geotechnical consultant shall be present onsite during all earthwork operations to document placement and compaction of fills, as well as to document compliance with the other recommendations presented herein. Additionally, the project geotechnical consultant shall provide observation and testing services based on scheduling determined during the pre-earthwork meeting during final clearing and grubbing operations to document compliance with the above recommendations. In addition, shall unusual or adverse soil conditions or buried			

	structures be encountered during grading that are not described herein, these conditions shall be brought to the immediate attention of the project geotechnical consultant for corrective recommendations. **GEO-8** Footings: a) Exterior continuous footings supporting one- and two-story light-weight construction shall be founded at a minimum depth of 15 inches below the lowest adjacent final grade. For concrete tilt up structures, continuous footings shall be founded at a minimum depth of 24 inches. Interior continuous footings may be founded at a minimum depth of 12 inches below the top of the adjacent finish floor slabs. b) In accordance with Table 1809.7 of 2022 CBC, all continuous footings shall have minimum widths of 12 inches for one- and two-story construction. Petra recommends all continuous footings shall be reinforced with a minimum of two No. 4 bars, one top and one bottom. c) A minimum 12-inch-wide grade beam founded at the same depth as adjacent footings shall be provided across openings such as large doors or bay windows. The grade beam shall be reinforced in a similar manner as provided above. d) Interior isolated pad footings, if required, shall be a minimum of 24 inches square and founded at a minimum depth of 12 inches below the bottoms of the adjacent floor slabs. Pad footings shall be reinforced with No. 4 bars spaced a maximum of 18 inches on centers, both ways, placed near the bottoms of the footings.			

	e) Exterior isolated pad footings intended for support of roof overhangs such as patio covers and similar construction shall be a minimum of 24 inches square, and founded at a minimum depth of 18 inches below the lowest adjacent final grade. The pad footings shall be reinforced with No. 4 bars spaced a maximum of 18 inches on centers, both ways, placed near the bottoms of the footings. Exterior isolated pad footings may need to be connected to adjacent pad and/or continuous footings via tie beams at the discretion of the project structural engineer. f) The minimum footing dimensions and reinforcement recommended herein may be modified (increased or decreased subject to the constraints of Chapter 18 of the 2022 CBC) by the structural engineer responsible for foundation design based on calculations, engineering experience, and judgment. **GEO-9** Building Floor Slabs: a) For office areas, and areas with light floor loading, concrete floor slabs shall be a minimum 4 inches thick and reinforced with a minimum No. 3 bars spaced a maximum of 18 inches on centers, both ways. For warehouse floors the slabs shall be a minimum of 5 inches thick and reinforced with a minimum No. 4 bars spaced a maximum of 18 inches on centers, both ways. All slab reinforcement shall be supported on concrete chairs or brick to ensure the desired placement near mid-depth. b) Slab dimension, reinforcement type, size and spacing need to account for internal concrete forces (e.g., thermal, shrinkage			

	and expansion) as well as external forces (e.g., applied loads), as deemed necessary. c) Moisture sensitive concrete floor slabs and areas to receive moisture sensitive floor covering shall be underlain with a moisture vapor retarder consisting of a minimum 10-mil-thick polyethylene or polyolefin membrane that meets the minimum requirements of ASTM E96 and ASTM E1745 for vapor retarders (such as Husky Yellow Guard®, Stego® Wrap, or equivalent). All laps within the membrane shall be sealed, and at least 2 inches of clean sand shall be placed over the membrane to promote uniform curing of the concrete. To reduce the potential for punctures, the membrane shall be placed on a pad surface that has been graded smooth without any sharp protrusions. If a smooth surface cannot be achieved by grading, consideration shall be given to lowering the pad finished grade an additional inch and then placing a 1-inch-thick leveling course of sand across the pad surface prior to the placement of the membrane. d) Prior to placing concrete, the subgrade soils below building and auxiliary area floor slabs shall be moisture conditioned to achieve a moisture content that is at least 1.2 times the optimum moisture content. This moisture shall penetrate to a depth of approximately 12 inches into the subgrade. e) The modulus of subgrade reaction for design of load bearing elements depends on the size of the element and soil-structure interaction. As a first level of approximation, a modulus of subgrade reaction of 125 pounds per cubic inch may be assumed for floor slab design.			

	f) The minimum dimensions and reinforcement recommended herein for building floor slabs may be modified (increased or decreased) by the structural engineer responsible for foundation design based on calculations, engineering experience, and judgment. **GEO-10** Positive surface drainage systems consisting of a combination of sloped concrete flatwork/asphalt pavement, sheet flow gradients, swales, and surface area drains (where needed) shall be provided around the building and within any planter areas to collect and direct all surface waters to an appropriate drainage facility as determined by the project civil engineer. The ground surfaces of planter and landscape areas that are located within 10 feet of building foundations shall be sloped at a minimum gradient of 5 percent away from the foundations and towards the nearest area drains. The ground surface of planter and landscape areas that are located more than 10 feet away from building foundations may be sloped at a minimum gradient of 2 percent away from the foundations and towards the nearest area drains. Concrete flatwork surfaces that are located within 10 feet of building foundations shall be inclined at a minimum gradient of one percent away from the building foundations and towards the nearest area drains. Concrete flatwork surfaces that are located more than 10 feet away from building foundations may be sloped at a minimum gradient of 1 percent towards the nearest area drains. Surface waters shall not be allowed to collect or pond against building foundations and within the level areas of the site. All drainage devices shall be properly maintained throughout the lifetime of the development. Future changes to			

	site improvements, or planting and watering practices, shall not be allowed to cause over-saturation of site soils adjacent to the structures. **GEO-11** If imported soils are required to complete the planned grading, these soils shall consist of clean materials devoid of rock exceeding a maximum dimension of 4 inches, organics, trash, and other deleterious materials. To avoid making revisions to the foundation design, imported soils shall also be granular and exhibit a very low expansion potential (Expansion Index 0-20). Prospective import soils shall be observed at the source, tested and approved by the geotechnical consultant prior to importing the soils to the site. It is recommended that the project environmental consultant shall also be notified so that they can confirm the suitability of the proposed import material from an environmental standpoint. Additional sampling and testing shall be performed during site grading for determining actual expansion potential of the supporting building pad soils.			
f. Destroy a unique paleontological resource or site or unique geologic feature (SI)	**GEO-12** If grading plans show that project related excavations go deeper than ten (10) feet, a qualified paleontological monitor shall be retained by the site developer(s) to check for fossils. Should construction/development activities uncover paleontological resources, work will be halted in that area and moved to other parts of the project site and the monitor shall determine the significance of these resources. The paleontologist shall have authority to divert grading away from exposed fossils temporarily in order to recover the fossil specimens. If the find is determined to be significant, avoidance or other appropriate measures shall be implemented as recommended by the monitor.	Qualified Paleontological Monitor City Planning Department Project Applicant/ Developer	During earth-moving activities reaching beyond the depth of three feet	Less than Significant

	GEO-13 All fossils and associated data recovered during the paleontological monitoring shall be reposted in a public museum or other approved curation facility based upon the specific resource recovered and recommendations form the paleontological consultant.			
4.7 Greenhouse Gas Emissions				
a. GHG Emissions that may Significantly Impact the Environment (SI) b. Conflict with Applicable Plan, Policy or Regulation (SI)	**GHG-1** Pursuant to MM GHG-1, the Project final plans and designs would conform to provisions of the CAP Update through implementation of the Screening Table Measures listed at Table 4.7-3. The Project shall implement Screening Table Measures providing for a minimum 100 points per the County Screening Tables. The Project would be consistent with the CAP Update's requirement to achieve at least 100 points. The City shall verify incorporation of the identified Screening Table Measures within the Project building plans and site designs prior to the issuance of building permit(s) and/or site plans (as applicable). The City shall verify implementation of the identified Screening Table Measures prior to the issuance of Certificate(s) of Occupancy. As shown on Table 4.7-3, the Project would yield 274 points which is more than double the required 100 points. The Project would therefore be consistent with the CAP.	City Planning Department Project Applicant/ Developer	Prior to the issuance of grading plans	Significant and Unavoidable
4.8 Hazards and Hazardous Materials				
a/b. Transport, Use, or Disposal and Accidental Release of Hazardous Materials (LTS) c. Emit hazards within one-quarter mile of a school (NI) d. Hazardous Materials Onsite (NI)	None required	N/A	N/A	Less than Significant

e. Result in a safety hazard within 2 miles of an airport (NI) f. Interfere with the Adoption or Implementation of an Emergency Response Plan g. Expose people or structures to wildland fires (NI)				
4.9 Hydrology and Water Quality				
a. Violation of Water Quality Standards or Waste Discharge Requirements b. Decrease groundwater supplies c. Alter the existing drainage pattern of the site, in a manner which would: i. Result in erosion or siltation on- or off-site; ii. Result in flooding on- or off-site; iii . Create or contribute runoff water; or iv. impede or redirect flood flows? d. Release of pollutants due to project inundation e. Conflict with a water quality control plan or sustainable groundwater management plan	None required	N/A	N/A	Less than Significant
4.10 Noise				
a. Generation of noise levels in excess of established standards (LTS) b. Generation of excessive groundborne vibration (LTS)	None required	N/A	N/A	Less than Significant

c. Excessive noise levels due to proximity to an airport or a private air strip (NI)				
4.11 Public Services				
a. Increased demand on Public Services: Fire, Police, Schools, Parks, Other Public Facilities (LTS)	None required	N/A	N/A	Less than Significant
4.12 Transportation				
a. Conflict with an applicable plan or policy addressing the circulation system (LTS) b. Inconsistent with CEQA Guidelines section 15064.3, subdivision (b) (SI) c. Increase hazards due to a geometric design feature (SI) d. Result in inadequate emergency access (SI)	**TRA-1: VMT Reduction Program** The Applicant will implement a VMT Reduction Program during operations which includes the following measures: • Implement a ridesharing program and provide preferential parking for rideshares. • Provide opportunities for telecommuting/ alternative work hour programs. • Construct on-site bicycle racks, lockers and shower rooms. **TRA-2: Traffic Control Plan** Prior to construction of any project related improvements, including offsite utilities and/ or issuance of a grading permit, the applicant shall prepare and submit the City of Palm Springs for review and approval detailed construction traffic management plans, including street closure information, detour plans, haul routes, and staging plans as necessary for any off-site work that would encroach on public right-of-way. The construction traffic management plans shall include the following elements, as appropriate:	City Public Works and Engineering, and Planning Departments Project Applicant	Prior to construction of any project related improvements including offsite utilities and/or issuance of grading plans	Significant and Unavoidable

	• Provisions for temporary traffic control during all construction activities adjacent to public right-of-way to improve traffic flow on public roadways (e.g., flag person); • Construction-related vehicles shall not park on surrounding public streets; • Provision of safety precautions for pedestrians and bicyclists through such measures as alternate routing and protection barriers; • Schedule construction-related deliveries to reduce travel during peak travel periods; • Obtain the required permits for truck haul routes from the County of Riverside and the City of Desert Hot Springs prior to the issuance of any permit for the project; and • Obtain a Caltrans transportation permit for use of oversized transport vehicles on Caltrans facilities. • Outline adequate measures to ensure emergency vehicle access during all aspects of the project's construction, including, but not limited to, the use of flagmen during partial closures to streets surrounding the project site to facilitate the traffic flow until construction is complete. • Include the implementation of security measures during construction in areas that are accessible to the general public to help reduce any increased demand on law enforcement services, including fencing construction areas, providing security lighting, and providing security personnel to patrol construction sites.			

4.13 Tribal Cultural Resources				
a. Cause substantial adverse change in significance of tribal cultural resource that is i. A site listed in the CRHR or Local Register, Tribal Cultural Resources ii. A resource determined to be significant to a California Native American tribe.	See **CUL-1**	N/A	N/A	Less than Significant
4.14 Utilities and Service Systems				
a. Require or result in the relocation or construction of new or expanded water, or wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects (LTS) b. Have sufficient water supplies available (LTS) c. Result in construction of new wastewater facilities (LTS) d. Generate excess solid waste (LTS) e. Comply with federal, state and local management and reduction statues and regulations related to solid waste (LTS)	None required	N/A	N/A	Less than Significant

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Chapter 2.0 Introduction

2.1 Purpose

This project Environmental Impact Report (EIR) has been prepared in accordance with the California Environmental Quality Act (CEQA). The City of Palm Springs, as the Lead Agency under CEQA, is responsible for preparing the Draft EIR for the proposed Palm Springs Fulfillment Center project. The project will require certain discretionary approvals by the City and other governmental agencies. Therefore, the project is subject to environmental review requirements under CEQA. This introduction is included to provide an overview of the purpose, content and format of this Draft EIR and its relationship to the City of Palm Springs's planning and environmental review process for the proposed project.

The project area encompasses approximately 38 acres. The project proposes the development of the fulfillment center, consisting of one 739,360 square foot, two-story building and associated infrastructure (retention, driveways, parking, landscaping, access points, and perimeter fencing). Off-site improvements proposed include the project's connection to existing sewer lines approximately 650 feet east, along the existing 19th Avenue right-of-way. A detailed description of the project is included in **Chapter 3.0** ***(Project Description)*** of this Draft EIR.

The Draft EIR has been prepared in conformance with CEQA (California Public Resources Code, Section 21000, et seq.), and the CEQA Guidelines (California Code of Regulations, Title 14, Section 15000, et seq.), and with the applicable City of Palm Springs policies and procedures.

As described in Section 15121 (a) and 15362 of the *State CEQA Guidelines*, an EIR is an informational document which will inform public agency decision makers and the public generally of the potentially significant environmental effects of a project, identify possible ways to minimize significant effects, and describe reasonable alternatives to the project. Thus, the purpose of this Draft EIR is to focus the discussion on those potential environmental effects of the project that the Lead Agency has determined could be significant. In addition, where applicable, feasible mitigation measures are recommended that could reduce or avoid any significant environmental impacts identified to the maximum extent feasible. The Palm Springs Planning Commission will consider the information presented in the document in making an informed decision regarding the entitlements requested for the project.

Preparation of the Draft EIR includes the preparation of technical studies such as Air Quality, Biological Resources, Cultural Resources, Geotechnical, Greenhouse Gas, Hydrology and Drainage, Noise, Traffic and Vehicle Miles Travelled (VMT), and continuing consultation with the appropriate agencies.

2.2 Review of the Draft EIR

Upon completion of the Draft EIR, the City of Palm Springs filed a Notice of Availability (NOA) and Notice of Completion (NOC) with the Governor's Office of Planning and Research, State Clearinghouse and the Riverside County Clerk to begin the public review period (Public Resources Code, Section 21161). The Draft EIR will be distributed to responsible and trustee agencies, other affected agencies, and interested parties, as well as all parties requesting a copy of the Draft EIR in accordance with Public Resources Code Section 21092(b)(3). During the public review period, the Draft EIR, including the technical appendices, is available for review at the City of Palm Springs Planning Division, the Palm Springs Library, and on the City's website. The addresses for each location are provided below:

City of Palm Springs

Planning Department
3200 East Tahquitz Canyon Way
Palm Springs, CA 92262
Phone: 760-323-8245
Hours: Monday – Thursday 8:00 a.m. to 6:00 p.m.

Website: https://www.palmspringsca.gov/government/departments/planning

Palm Springs Public Library

300 South Sunrise Way
Palm Springs, CA 92262
Phone: 760-322-7323
Hours: Monday – Thursday 10 a.m. to 6 p.m.; Friday – Saturday 10 a.m. to 5 p.m.

Agencies, organizations, and interested parties who wish to comment on the Draft EIR during the 45-day public review period are requested to provide written comments to:

Glenn Mlaker
City of Palm Springs
3200 East Tahquitz Canyon Way
Palm Springs, CA 92262
Phone: 760-323-8245
Email: glenn.mlaker@palmspringsca.gov

Upon completion of the public review period, written responses to all public comments received will be prepared and included in the Final EIR. Responses to comments will be made available for review at least 10 days prior to the public hearing before the Planning Commission, at which time the certification of the EIR will be considered.

2.3 Scope of the EIR

2.3.1 Notice of Preparation

The City of Palm Springs issued a Notice of Preparation (NOP) to prepare a Draft EIR for a 30-day review period between August 7, 2023, and September 8, 2023. The NOP included an evaluation of the environmental topics that will and will not be analyzed within the Draft EIR. The evaluation was prepared using Appendix G, Environmental Checklist Form, in the California Environmental Quality Act (CEQA) Guidelines. The Palm Springs Fulfillment Center NOP is included in **Appendix A** of this Draft EIR, as are all comments received on the NOP. The Draft EIR will address all environmental topics, excluding agriculture and forestry resources, land use and planning, mineral resources, recreation, and wildfires. It was determined in the NOP that these elements would result in no impacts related to the proposed project, and they are not required to be analyzed further in the Draft EIR. Please consult **Appendix A** for the analysis provided in the Notice of Preparation, and **Chapter 6.0**, ***Effects Not Found to be Significant,*** for details of those topics not further analyzed in this document.

The NOP was sent to the State Clearinghouse and to all responsible and trustee agencies, and to interested parties. Issues raised by agencies and the public in response to the NOP were considered in the preparation of the Draft EIR.

The City received four comment letters during the NOP comment period. Three comment letters were from Public Agencies, and one comment letter was from a private organization. The comments are listed below:

Public Agencies -

1. *Native American Heritage Commission (NAHC),* in their letter dated August 4, 2023, requires that the project participate in Assembly Bill (AB) 52 and Senate Bill (SB) 18 tribal consultation.
2. *South Coast Air Quality Management District (SCAQMD),* in their letter dated August 18, 2023, requested that the topic of air quality be discussed in the EIR. SCAQMD also requested that all appendices and technical documents related to the air quality, health risks, and greenhouse gas analyses and electronic versions of all emission calculation spreadsheets, and air quality modeling and health risk assessment input and output files be provided to them.
3. *California Department of Fish and Wildlife (CDFW),* in their letter dated September 5, 2023, offers comments and recommendations for the project to assist the City in identifying the project's potential impact to biological resources. CDFW recommends discussion topics and resources to be addressed in the Draft EIR.

Private Organization -

4. *CARE CA,* in their letter dated August 14, 2023, requests a copy of all records related to the project.

5. *CARE CA,* in their letter dated September 6, 2023, offers comments and recommendations for discussion topics and resources to be addressed in the Draft EIR. CARE CA requested that the DEIR provide a variety of alternatives; provide details of any and all future industrial warehouse uses of the project; analyze air quality and pollution impacts and GHG emission impacts; and provide a discussion of cumulative effects of the project and surrounding commercial and industrial developments in the area.

2.3.2 CEQA Standards for Adequacy

This Draft EIR provides an evaluation of the potential environmental effects associated with the development of the approximately 38-acre Palm Springs Fulfillment Center project site, located on the northwest corner of Indian Canyon Drive and 19th Avenue.

This EIR was prepared in accordance with Section 15151 of the *State CEQA Guidelines*, which defines the standards for EIR adequacy as follows:

> *An EIR should be prepared with a sufficient degree of analysis to provide decision-makers with information which enables them to make a decision which intelligently takes account of environmental consequences. An evaluation of the environmental effects of a proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in the light of what is reasonably feasible. Disagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among the experts. The courts have looked not for perfection but for adequacy, completeness, and a good faith effort at full disclosure.*

2.4 Organization of the EIR

This Draft EIR has been prepared as a Project-level EIR to evaluate the proposed project. A comprehensive project description including exhibits and maps is presented in **Chapter 3.0, *Project Description***.

The Draft EIR is organized into the following main chapters and sections:

Table of Contents. Lists the Draft EIR chapters and sections with their corresponding page numbers.

Glossary of Terms. This chapter contains a full list of acronyms that were used throughout the EIR.

Chapter 1.0: Executive Summary. This chapter includes a summary of the proposed project and a discussion of the alternatives to the project. A brief description of the areas of controversy and issues to be resolved, and overview of potential impacts, and the Mitigation, Monitoring and Reporting Program (MMRP) are also included in this section.

Chapter 2.0: Introduction. This chapter provides an introduction and overview describing the purpose of the EIR, a brief history of the project, the scope of the EIR, and the review and certification

process. This chapter identifies the documents incorporated by reference in the EIR and where these documents can be reviewed. Finally, this chapter includes a summary of the comments received on the Notice of Preparation.

Chapter 3.0: Project Description. This chapter includes a detailed description of the proposed project, including its location, existing site conditions, project history, and project characteristics. Also included is a discussion of the project objectives, intended uses of the EIR, responsible agencies and their roles in the environmental process, and approvals that are needed for the proposed project.

Chapter 4.0: Environmental Impact Analysis. This chapter contains a comprehensive evaluation of the environmental impacts of the proposed project. Impacts are organized into major environmental topics consistent with Appendix G of the CEQA Guidelines. Each section includes a description of the environmental setting (the existing physical environment and the regulatory environment); the methodology for evaluating impacts, significance criteria, potential impacts, a discussion of existing rules and regulations imposed on the project by the lead, responsible and trustee agencies to reduce potential environmental effects of the project; project design features built into the project to comply with regulatory requirements, such as Title 24 (Energy) and the California Building Code (CBC); proposed mitigation measures (in addition to environmental requirements already imposed on the project by regulatory agencies), and a finding of the level of significance after mitigation. The impact evaluation considers direct impacts, indirect impacts, and cumulative impacts. The following environmental topics are addressed within Chapter 4.0.

Section 4.1 – Aesthetics: Addresses visual impacts that may occur with implementation of the proposed project.

Section 4.2 – Air Quality: Addresses the local and regional air quality impacts associated with project implementation as well as consistency with the South Coast Air Quality Management Plan (SCAQMP). This section also addresses the potential for odors to affect existing and future sensitive receptors in the project's vicinity.

Section 4.3 – Biological Resources: This section provides a summary of local conservation areas, addresses the project's impacts on habitat and wildlife in the area, and summarizes the biological resources study prepared for the project.

Section 4.4 – Cultural Resources: Addresses the impacts of project development on historic, cultural, and archaeological resources. Note: Tribal Cultural Resources are addressed separately in Section 4.14.

Section 4.5 – Energy Resources: Addresses the impacts of project development on energy resources during project construction and operation, as well as whether the project will conflict with a state or local plan for renewable energy or energy efficiency.

Section 4.6 – Geology and Soils: Addresses the potential impacts the project may have on soils and assesses the effects of the project in relation to geologic and seismic conditions. This section also addresses paleontological resources.

Section 4.7 – Greenhouse Gas Emissions: Addresses the project's estimated contribution to global climate change through the emission of greenhouse gases during construction and long-term operation of the proposed project.

Section 4.8 – Hazards and Hazardous Materials: Addresses the likelihood of the presence of hazardous materials or conditions on the project site and in the project area or the transport or use of hazardous materials by the project that may have the potential to impact human health.

Section 4.9 – Hydrology and Water Quality: Addresses the impacts of the project on regional and local hydrological conditions, including drainage areas, and changes in flow rates; as well as potential impacts that may currently exist that must be addressed to prevent flooding. This section also summarizes the requirements for storm water control, retention and release for the project area.

Section 4.10 – Noise: Addresses the project's noise impacts that may occur during construction and operation on existing and future land uses after compliance with the City's Noise Ordinance.

Section 4.11 – Population and Housing: Addresses the potential of the Project to induce direct and indirect growth related to population, housing and employment growth.

Section 4.12 – Public Services: Addresses the project's impacts upon public service providers including fire and police services.

Section 4.13– Transportation: Addresses the project's impacts on the local and regional roadway system including emergency access, public transportation, bicycle, and pedestrian facilities, as well as an analysis of vehicle miles traveled (VMT).

Section 4.14 – Tribal Cultural Resources: Addresses the potential adverse impacts to tribal cultural resources, including the results of the City's Native American consultation with affected tribes.

Section 4.15 – Utilities and Service Systems: Addresses the project's impacts on water supply, wastewater treatment, storm drains, electricity, natural gas, telecommunications, and solid waste.

Chapter 5.0: Other CEQA Sections. This chapter provides a summary of significant environmental impacts, including unavoidable and growth-inducing impacts, and any irreversible and irretrievable commitment of resources. This chapter also provides a summary of environmental issues where findings can be made that the project would not cause an impact on the environment or that the impact would be negligible.

Chapter 6.0: Effects Found to Have No Impact. This discussion presents the analysis of the environmental topic thresholds that result in no impacts, as determined in the Initial Study prepared with the Notice of Preparation. The conclusion that the proposed project has no impacts related to

specific sub-sections in aesthetics, agriculture and forestry, biological resources, geology and soils, hazards and hazardous materials, land use and planning, mineral resources, noise, population and housing, public services, recreation, and wildfire, per the CEQA Guidelines, are summarized in this chapter.

Chapter 7.0: Alternatives. This chapter compares the impacts of the proposed project with four project alternatives: the No Project Alternative where no development would occur, a Reduced Intensity Alternative, and an Industrial Business Park Alternative.

Chapter 8.0: References. This chapter contains a full list of references that were used in the preparation of the EIR. This chapter also provides a list the report preparers and consultants, along with agencies, and individuals that provided information used to prepare this Draft EIR.

Appendices. Includes all notices and other procedural documents pertinent to the preparation of the EIR, as well as all technical material prepared to support the environmental analysis.

2.5 Reference Documents

2.5.1 Documents Incorporated by Reference

As permitted by CEQA Guidelines Section 15150, this Draft EIR has referenced several public documents. Information from the documents has been briefly summarized in the appropriate sections(s).

The documents (and their locations) include:

- Palm Springs General Plan

  (Palm Springs Website: https://www.palmspringsca.gov/government/departments/planning/general-plan)

- Palm Springs General Plan Environmental Impact Report
- Palm Springs Municipal Code

  (https://ecode360.com/PA4982)

2.5.2 Documents Prepared for the Project

The technical studies prepared for the proposed project and other informational documents are listed below, with their corresponding appendix number. These documents are included in their entirety as part of the appendices for the Draft EIR.

Appendix A	Notice of Preparation and Public Comment Letters
Appendix B	Photometric Plan
Appendix C.1	Air Quality Impact Analysis

Appendix C.2	Health Risk Assessment
Appendix D	Biological Report
Appendix E	Cultural Report
Appendix F	Energy Analysis
Appendix G	Geotechnical and Infiltration Investigation
Appendix H	Greenhouse Gas Analysis
Appendix I	Phase I Environmental Site Assessment
Appendix J.1	Preliminary Hydrology Report
Appendix J.2	Preliminary Water Quality Management Plan
Appendix K	Noise Study
Appendix L.1	Traffic Study
Appendix L.2	Vehicle Miles Traveled (VMT) Analysis
Appendix M	Water Supply Assessment
Appendix N	Project Alternatives Memo

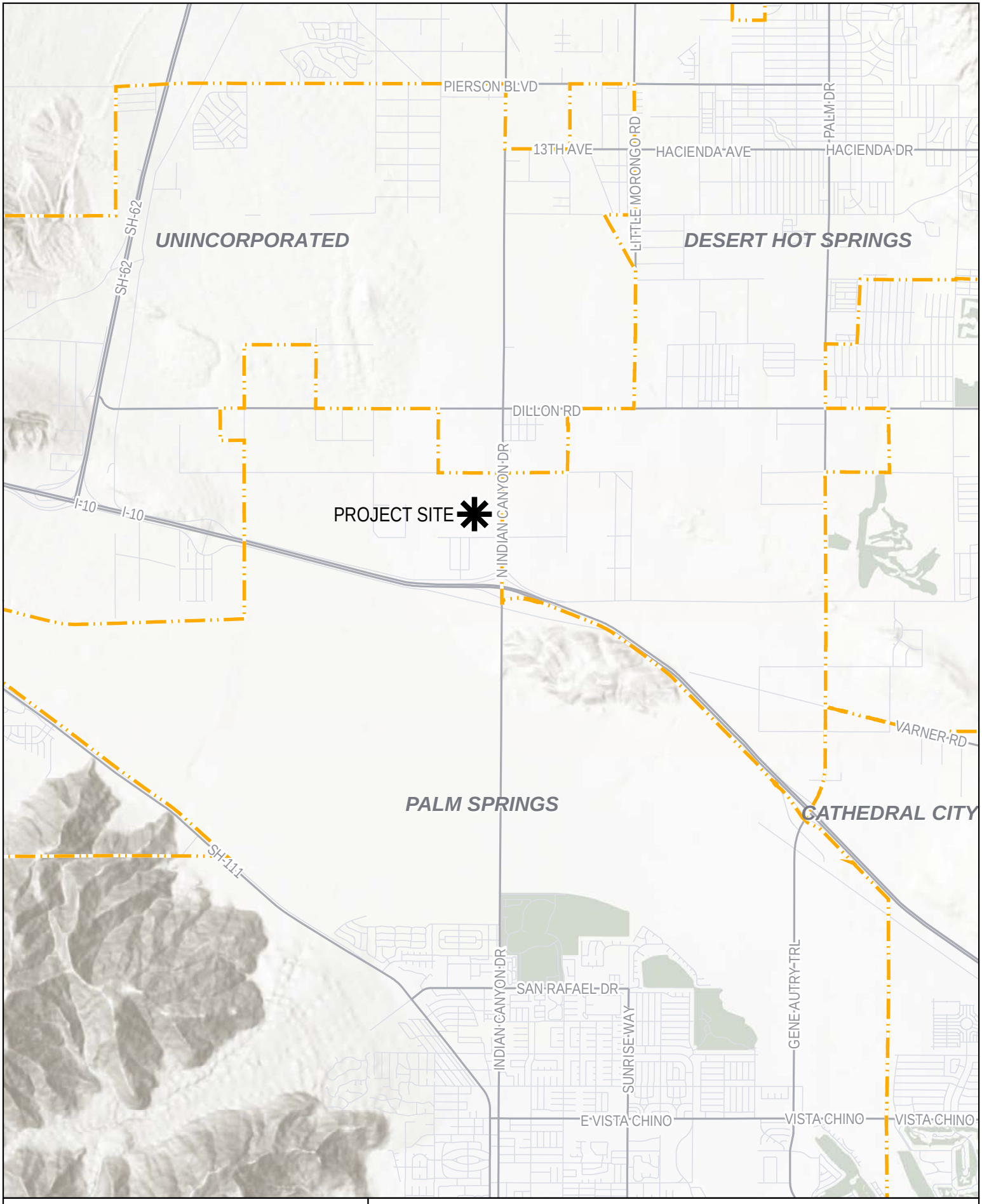
Chapter 3.0 Project Description

3.1 Introduction

This section of the Draft EIR describes the location, objectives, and characteristics of the proposed Palm Springs Fulfillment Center project ("project") and the intended uses of this Draft EIR, as required by the CEQA Guidelines. Included in this section is a description of the proposed project's technical, economic, and environmental characteristics.

3.2 Project Location

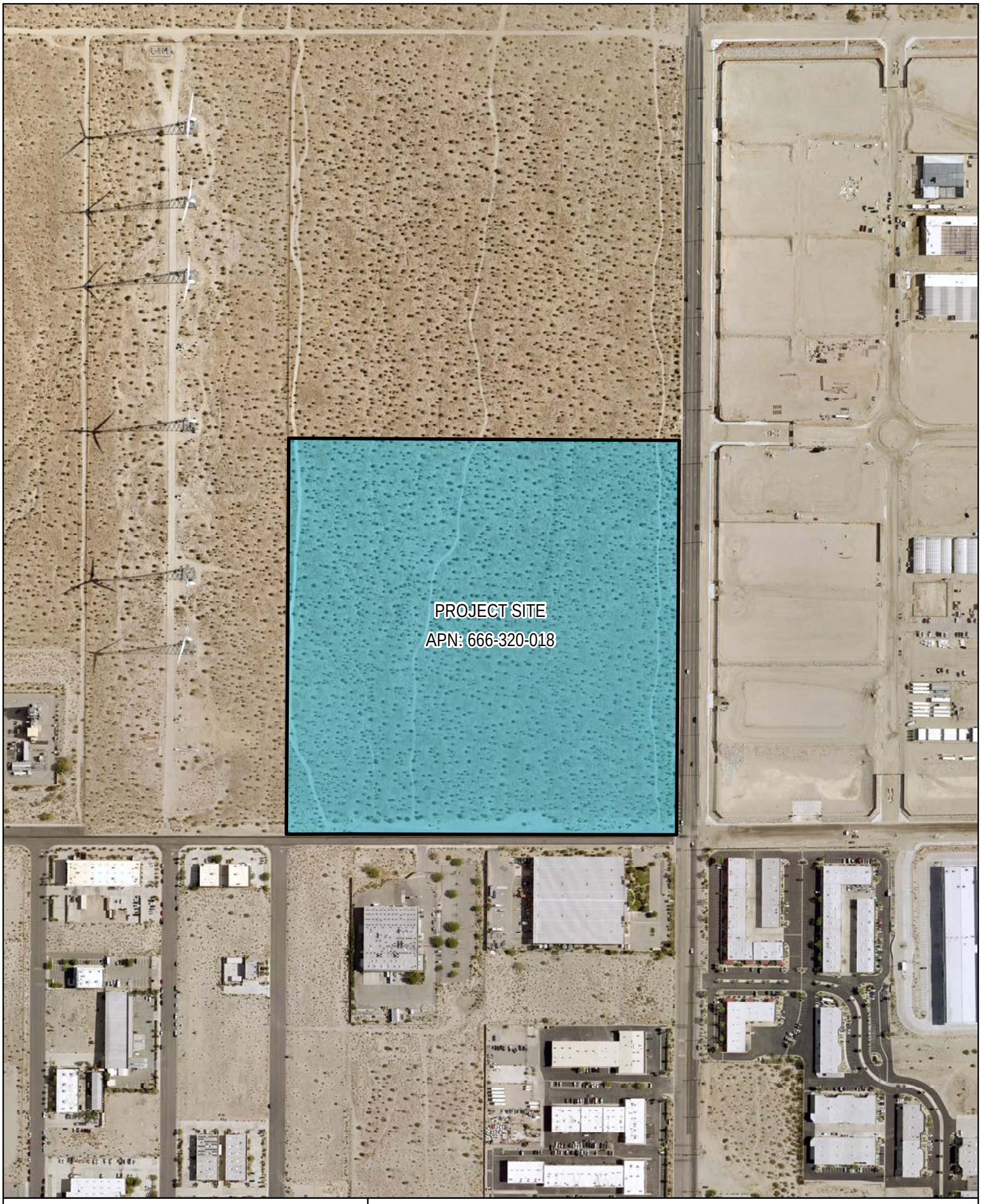
The City of Palm Springs is located in the Coachella Valley, in eastern Riverside County. **Exhibit 3-1*, Vicinity Map***, shows the City's location within the larger Coachella Valley region. The project site encompasses an area of approximately 38 acres in the northern portion of the City of Palm Springs. The local area is characterized as a developing area with a number of industrial and commercial properties to the south and east, vacant land to the north, and a substation, and vacant land to the west. 19th Avenue delineates the property's southern boundary, while Indian Canyon Drive delineates the eastern boundary. **Exhibit 3-2, *Aerial Photograph***, displays an aerial view of the project site, outlining the project boundary, adjacent roadways and neighboring properties. Further discussion of the land uses adjacent, and in proximity to the project, is included in Section 3.3, *Surrounding Land Uses*. The project is located in a portion of the southeast ¼ of the northeast ¼ of Section 15, Township 3 South, Range 4 East, San Bernardino Base Meridian; and at Latitude 33° 54' 44" N, Longitude 116° 32' 50" W (approximate geographic center of the site).



MSA CONSULTING, INC.
> PLANNING > CIVIL ENGINEERING > LAND SURVEYING

0 NORTH 5,000 FT

VICINITY MAP
PALM SPRINGS FULFILLMENT CENTER
EXHIBIT 3-1



MSA CONSULTING, INC.
> PLANNING > CIVIL ENGINEERING > LAND SURVEYING

0 NORTH 400 FT

AERIAL PHOTOGRAPH
PALM SPRINGS FULFILLMENT CENTER
EXHIBIT 3-2

3.3 Surrounding Land Uses

As shown in **Exhibit 3-2, *Vicinity Map***, and **Exhibit 3-3, *Aerial Photograph***, the project occupies approximately 38 acres of vacant land in the City of Palm Springs. The property boundaries are delineated by Indian Canyon Drive on the east; 19th Avenue on the south; vacant land (delineated by a chain link fence) on the west; and a vacant lot on the north. Land uses surrounding project area are as follows (see the aerial photograph in **Exhibit 3-2**):

Direction	Description
North	• Vacant Property
East	• Indian Canyon Drive • Coachillin Business Park (within the City of Desert Hot Springs's jurisdiction)
South	• 19th Avenue • Commercial Businesses
West	• Wind Turbines • Electric Substation • Vacant Property

3.4 Existing Project Conditions

The project site is currently vacant and undeveloped. The project site is not physically screened or fenced, but can be distinguished by the adjoining roads to the east and south. The west boundary of the project site is physically marked by the barbed wire fence.

The prevailing condition of the site is defined as relatively level, with uniform sandy terrain and scattered vegetation. Sparse small- to medium-sized boulders also exist onsite. Three north-south-trending dirt paths are distinguishable along the west edge, center, and east edge respectively. Soil disturbance and vehicle tracks are indicative of recent trespassing and dumping of refuse.

Various deposits of scattered trash and demolition debris exist onsite, most of which are noted along the dirt paths. The discarded materials include household items (articles of clothing and plastic trash). The demolition waste includes broken concrete, asphalt, tile, and gravel in small quantities. Other items include vehicle tires, plastic tubing, and pieces of broken furniture. The northeast portion of the property contains various piles of soil, gravel, and small boulders.

Historical aerial photographs are provided in **Appendix I, *Phase I Environmental Site Assessment.***

3.5 Proposed Project

3.5.1 Project Objectives

The project proposes to develop a two-story, approximately 739,360-square-foot industrial building within the City of Palm Springs's Industrial land use designation. The project has identified the following objectives:

- Promote quality development consistent with the goals and policies of the Palm Springs General Plan.
- Develop a state-of-the-art industrial fulfillment center in the Industrial land use area in Palm Springs that is consistent in use and look with the existing developments in the surrounding area.
- Provide employment opportunity and growth in the City's Industrial land use designation north of the Interstate 10 freeway.
- Concentrate nonresidential uses near existing roadways, highways, and freeways in an effort to isolate and reduce any potential environmental impacts related to truck traffic congestion, air emissions and industrial noise to the greatest extent feasible.
- Create a project that takes advantage of existing infrastructure, including the proximity to major regional roadways, such as Interstate 10, and other similar infrastructure.

3.5.2 Project Description

The project area encompasses approximately 38 acres. The project proposes a Major Development Permit application leading to the development of a high cube warehouse with fulfillment capabilities.

The ultimate build-out of the approximately 38-acre area includes a two-story, 739,360-square-foot fulfillment center with offices, and associated infrastructure (paved driveways and parking, landscaping, three gated access points, retention area, and perimeter fencing).

The build out components include:

- One building for industrial warehousing operations
  - Proposed building is two-stories and 739,360 square feet
    - 727,360 square feet for warehouse uses
    - 12,000 square feet for office uses
  - Proposed in one phase
- Approximately 4.15 acres of landscaped and retention areas
  - One landscaped retention basin located along the southern boundary
  - Trees, shrubs, and accents proposed along the project's eastern and southern sides.
- 736 parking stalls to be provided

  - Located along the northern, eastern, and southern boundary
- Four vehicular access points
  - Primary gated truck access on 19th Avenue (Driveway 4) at the southwest project corner
    - Full access
    - Manned gate during business hours, and call box key pad during off hours.
  - Three access points along Indian Canyon Drive
    - Access to employee parking lot (no truck access)
    - Driveway 1 (northern-most access point) and Driveway 3 (southern-most access point) are right-in/right-out only access
    - Driveway 2 (between Driveway 1 and 3) will provide full access via a 150' northbound left turn lane within striped median on Indian Canyon Drive, and one eastbound shared left-right turn lane with cross-street stop control
    - Two gated access points provides vehicular access to warehouse/truck parking along the northern and southern boundaries
      - Call box key pad entry
- Trash enclosures will be located at each corner of the project building.
- Metal chain-link fencing surrounding property during project construction and operation.
- Underground and landscaped stormwater retention basin proposed to provide storage of the 100-year controlling storm event
  - The landscaped retention basin will be located along the southern project boundary
  - Two underground retention chambers proposed along the paved drive aisles and parking spaces along the northern and southern boundary
- Domestic water will connect to existing 12-inch water main on 19th Avenue
  - Proposed 12-inch offsite water line will connect to the existing 19th Avenue water main located within the right-of-way
  - Internal private water lines will be 8 inches
  - Mission Springs Water District will provide water service to the project
- Onsite fire lines will connect to existing 12-inch water main on Indian Canyon Drive (near the northeast property boundary) and 19th Avenue (near the southwest and southeast property boundaries).
  - Proposed 12-inch water service will connect the existing water lines located within the 19th Avenue right-of-way (near the southeast property boundary)
  - Fire hydrants are proposed at each corner of the project (4 fire hydrants in total)
- Sanitary sewer connections to the site will occur on 19th Avenue from an existing 6-inch sewer line approximately 650 feet east of Indian Canyon Drive in 19th Avenue
  - Private internal sewer lines will be 8 inches
- The project will connect to existing infrastructure provided by Southern California Edison (SCE) along Indian Canyon Drive

  - The project's connection to SCE infrastructure will be designed and constructed to the SCE standards. The proposed connection will be limited to improvements within existing SCE facilities and disturbed rights-of-way.
- Project operations:
  - 700 employees; 1,574 (actual) vehicle trip-ends per day and 2,134 Passenger Car Equivalent (PCE) trip-ends per day.
  - Hours of operation will be 24/7

Historically, high cube warehouses with fulfillment capabilities were categorized as either "sort" or "non-sort" facilities. Sort warehouses have typically been associated with high concentrations of employment used to separate packages for small vehicle deliveries, which result in increased vehicle trips and parking requirements. Non-sort facilities have typically been associated with either non-fulfillment or highly automated fulfillment operations, which are less employee intensive compared to sort facilities. Today, normal high cube warehouse operations are not exclusively confined to the definition of sort or non-sort facilities, but balance warehouse operations that moderate employee intensity by incorporating reasonable means of mechanical sorting in support of possible fulfillment capabilities. The proposed project will be consistent with today's standards of normal high cube warehouse operations. The number of employees is based on the Riverside County Model (RIVCOM), a study released in 2020.[1]

Major Development Permit

The purpose of a Major Development Permit is to ensure that the proposed development is consistent with the General Plan, Zoning Code, and other adopted plans, regulations, and policies of the City; that the location, height, massing, and placement of the proposed development is consistent with applicable standards; and that the necessary infrastructure is in place to serve the proposed development. A Major Development Permit is required for new industrial buildings. Major Development Permit submittals shall include a site plan; preliminary grading plan; floor plans; building elevations; roof plan; landscape plan; material and color selections; lighting plan; signage plan; and other plans or exhibits required by the Director (Section 94.04.01(B) and 94.04.01(C)(1)(b) of the Palm Springs Municipal Code).

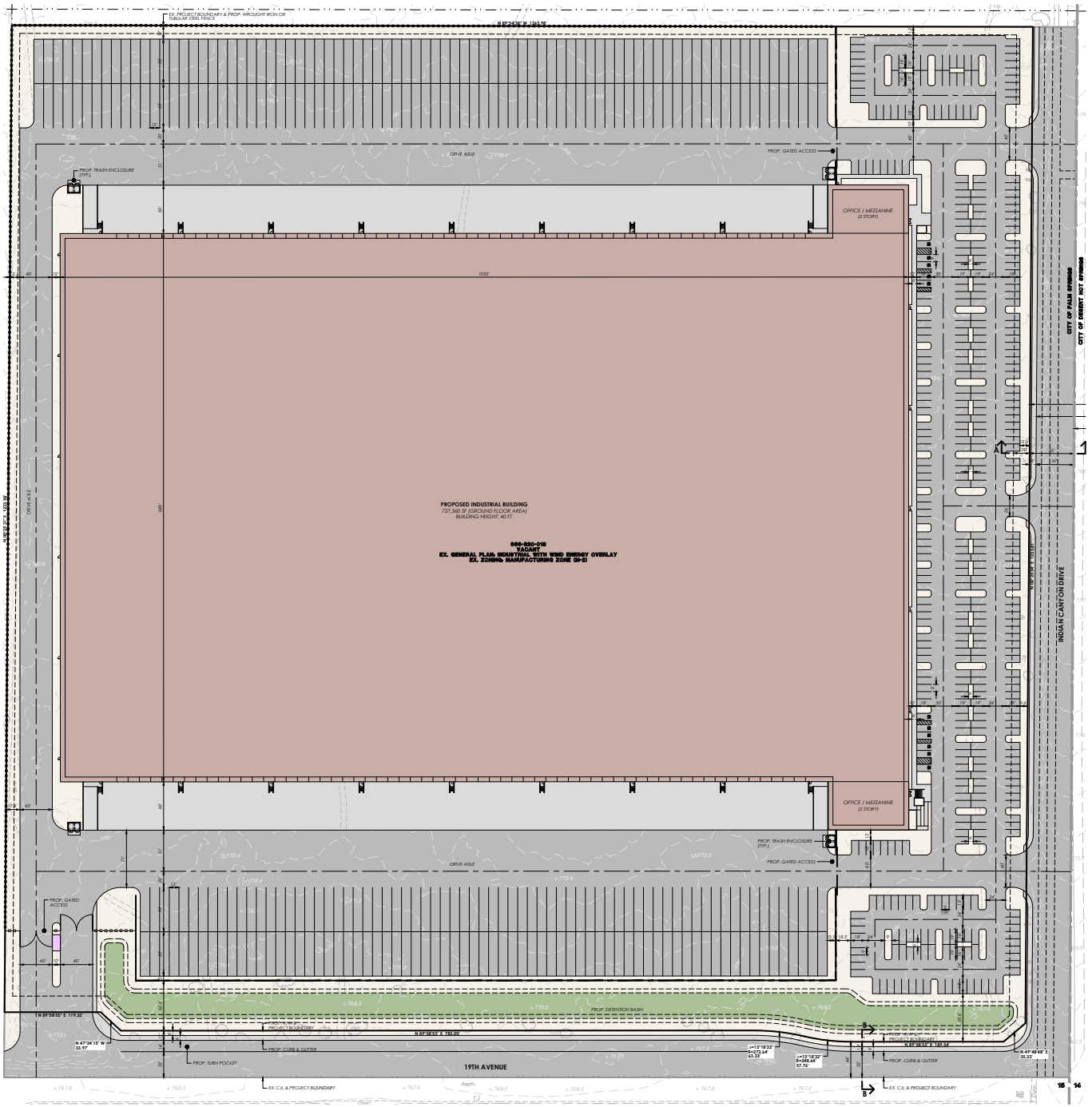
The building elevations and sections plans, material and color selections, and lighting plan are provided in **Section 4.1, *Aesthetics,*** of this Draft EIR.

Landscape

The project landscape will include drought-tolerant trees (24-inch boxes), 12-foot palms, and ground covers (15-gallon) typically found in the region, such as willow acacia, desert museum palo verde, thornless honey mesquite, and date palm. Shrubs and accent plantings proposed for the project

[1] VMT Evaluation, Urban Crossroads, Inc., January 2023 (**Appendix L.2**).

include outback sunrise emu bush, new gold lantana, Lindheimer's muhly, firecracker plant, various agave, cactus, yucca, and aloe. Fractured rock, and decomposed granite will provide ground cover. Exterior irrigation will use drip or micro-spray applicators. One retention basin is proposed along the southern project boundary. The landscaped areas and the retention basin proposed for the site will occupy approximately 4.15 acres of the property. The parking spaces immediately north of the retention basin will be separated by masonry block wall and fencing. See **Exhibit 3-6, *Conceptual Landscape Plan***, for locations of the proposed plantings on the project site.



IN THE CITY OF PALM SPRINGS, COUNTY OF RIVERSIDE, STATE OF CALIFORNIA

TECHNICAL SITE PLAN

EXHIBIT DATE: JANUARY 12, 2023

REVISIONS

NO.	DATE	DESCRIPTION

DATA TABLE

APPLICANT / LAND OWNER:	SNIDER INTERESTS, LLC		
ADDRESS:	730 ARCADY ROAD MONTECITO, CALIFORNIA 93108		
CONTACT:	DAVID SNIDER		
EXHIBIT PREPARER:	MSA CONSULTING, INC.		
ADDRESS:	34200 BOB HOPE DRIVE RANCHO MIRAGE, CALIFORNIA 92270		
CONTACT:	PAUL DEPALATIS, AICP	**TELEPHONE:**	(760) 320-9811
SOURCE OF TOPOGRAPHY:	INLAND AERIAL SURVEYS, INC.		
ADDRESS:	7117 ARLINGTON AVENUE, SUITE A RIVERSIDE, CALIFORNIA 92503		
DATE OF TOPOGRAPHY:	APRIL 13, 2022	**TELEPHONE:**	(951) 687-4252
ASSESSOR'S PARCEL NUMBER:	666-320-018		

LEGAL DESCRIPTION:

A PORTION OF THE SOUTHEAST 1/4 OF THE NORTHEAST 1/4 OF SECTION 15, TOWNSHIP 3 SOUTH, RANGE 4 EAST, SAN BERNARDINO MERIDIAN.

LAND USE DESCRIPTION:	SF	AREA	PERCENTAGE
EXISTING GROSS ACREAGE	1,722,174 SF	39.54 AC.	-
PROPOSED RIGHT OF WAY DEDICATION (INDIAN CANYON ROAD & 19TH AVENUE)	144,550 SF	3.32 AC.	-
PROPOSED NET ACREAGE	1,577,624 SF	36.22 AC.	100%
PROPOSED BUILDING AREA	727,360 SF	16.70 AC.	46%
ACCESS ROADS, HARDSCAPE & PARKING	669,389 SF	15.37 AC.	42%
LANDSCAPE, OPEN SPACE & RETENTION AREAS	180,875 SF	4.15 AC.	12%

BUILDING DESCRIPTION:

INDUSTRIAL BUILDING

ONSITE PARKING DATA:	SF	PARKING RATIO	PARKING %	COUNT
PROPOSED INDUSTRIAL BUILDING	**727,360 SF** (1ST 100,000 SF) (2ND 100,000 SF) (REMAINDER)	- 1 STALL PER 800 SF 1 STALL PER 1,250 SF 1 STALL PER 5,000 SF	- - - -	- 125 STALLS 80 STALLS 106 STALLS
TOTAL PARKING REQUIRED	**727,360 SF**	-	-	**311 STALLS**
STANDARD STALLS PROVIDED	-	-	-	419 STALLS
HANDICAP STALLS PROVIDED	-	-	-	11 STALLS
TRUCK PARKING PROVIDED	-	-	-	306 STALLS
TOTAL PARKING PROVIDED	-	-	**100%**	**736 STALLS**

MSA CONSULTING, INC.
> PLANNING > CIVIL ENGINEERING > LAND SURVEYING

NORTH
NOT TO SCALE

SITE PLAN
PALM SPRINGS FULFILLMENT CENTER
EXHIBIT 3-3

Legend

1. Concrete Paving
2. Decomposed Granite
3. Fractured Rock
4. Large Shade Trees
5. Date Palm Grove
6. Truck Parking
7. Truck Entry Gate with Guardhouse
8. Metal Chain Link Fence
9. CMU Block Retaining Wall with 8' Metal Chain Link Fence
10. Entry Gate

Shrubs and Accents





Plant Schedule

Trees and Palms



Hardscape


IN THE CITY OF PALM SPRINGS, COUNTY OF RIVERSIDE, STATE OF CALIFORNIA	
LANDSCAPE SHADE ANALYSIS	
EXHIBIT DATE: JANUARY 11, 2023	
TOTAL PARKING STALL AREA	70,847 SQFT
TOTAL SHADED PARKING AREA	35,050 SQFT
PERCENTAGE	50%

MSA CONSULTING, INC.
> PLANNING > CIVIL ENGINEERING > LAND SURVEYING

NORTH
NOT TO SCALE

LANDSCAPE PLAN
PALM SPRINGS FULFILLMENT CENTER
EXHIBIT 3-4

3.5.3 Project Construction

Project construction will occur in one phase. The construction activities include site preparation, grading, building construction, paving, and architectural coating. Construction is anticipated to begin in January 2025 and will last through April 2026.

Along with construction of the warehouse facility, construction will also include circulation and parking facilities, public utilities, and infrastructure described above, and be in accordance with the final conditions of approval for the project. Equipment utilized for construction of the project is listed below. Consistent with industry standards and typical construction practices, each piece of equipment will operate up to a total of eight hours per day.

Table 3-1 Construction Equipment Assumptions

Phase Name	Equipment	Amount	Hours per Day
Site Preparation	Rubber Tired Dozers	2	8
	Crawler Tractors	2	8
Grading	Excavators	2	8
	Graders	1	8
	Rubber Tired Dozers	1	8
	Scrapers	2	8
	Crawler Tractors	2	8
Building Construction	Cranes	2	8
	Forklifts	6	8
	Generator Sets	2	8
	Tractor/Loaders/Backhoes	6	8
	Welders	2	8
Paving	Pavers	2	8
	Paving Equipment	2	8
	Rollers	2	8
Architectural Coating	Air Compressors	1	8

In addition, to support the project development, there will be off-site improvements associated with the project's connection to existing sewer lines located approximately 650 feet east of the project, along 19th Avenue. It is expected that the off-site construction activities would only occur during permitted construction hours. Construction of the off-site sewer line will not take place at one location for the entire duration of construction; however, it will move along the right-of-way segment by segment.

3.6 Circulation Plan

Circulation for the proposed project includes the development of gated access points, internal drive aisles, and paved parking spaces. Access to the project will be provided at three points along Indian Canyon Drive and one point on 19th Avenue. Both public roadways are paved but have no curb and gutter improvements. They will be improved to the standards of the City of Palm Springs General Plan Circulation Element. According to the Palm Springs General Plan, Indian Canyon is identified as a Major Thoroughfare (4-lane divided), and 19th Avenue is a Secondary Thoroughfare (4-lane undivided). The project will construct 19th Avenue from the project's western boundary to Indian Canyon Drive at its ultimate half-section width as a Secondary Thoroughfare, with a minimum pavement width of 64 feet; and construct Indian Canyon Drive from the northern project boundary to 19th Avenue at its ultimate half-section width as a Major Thoroughfare, with a minimum pavement width of 76 feet.

The facility includes access on both Indian Canyon Drive and 19th Avenue, with truck traffic/access limited to 19th Avenue. The project proposes two right-in/right-out access driveways and one full access driveway along Indian Canyon Drive. The access points along Indian Canyon Drive enter the project parking lot. The proposed full access driveway along 19th Avenue will be located at the southwest corner of the project and utilized by truck traffic only.

Gated access will limit vehicular access to authorized individuals and personnel. Project-related vehicular access and entries are consistent with City requirements. The access points onsite will provide emergency access to the project. Emergency vehicles will have access to the gated areas via a Knox box.

The internal circulation system will consist of a series of drives around the project building. The east side of the project building is designated for auto parking for employees, while the paved drive aisles along the building's north, west, and south sides are designated for truck access only. The proposed internal rights of way vary from 24-foot-wide drives to 71-foot-wide drives. Pedestrian walkways will be located along the project frontage, adjacent to Indian Canyon Drive, as well as along building frontages.

3.7 Infrastructure Plan

The system planned to serve the project will be designed to provide a coordinated infrastructure and public services to adequately serve the project area at full buildout. The project will be served by the following utilities:

- Water: Mission Springs Water District
- Sewer: Mission Springs Water District
- Electricity: Southern California Edison (SCE)

3.7.1 Water and Sewer

Mission Springs Water District (MSWD) will provide water service for the project property.

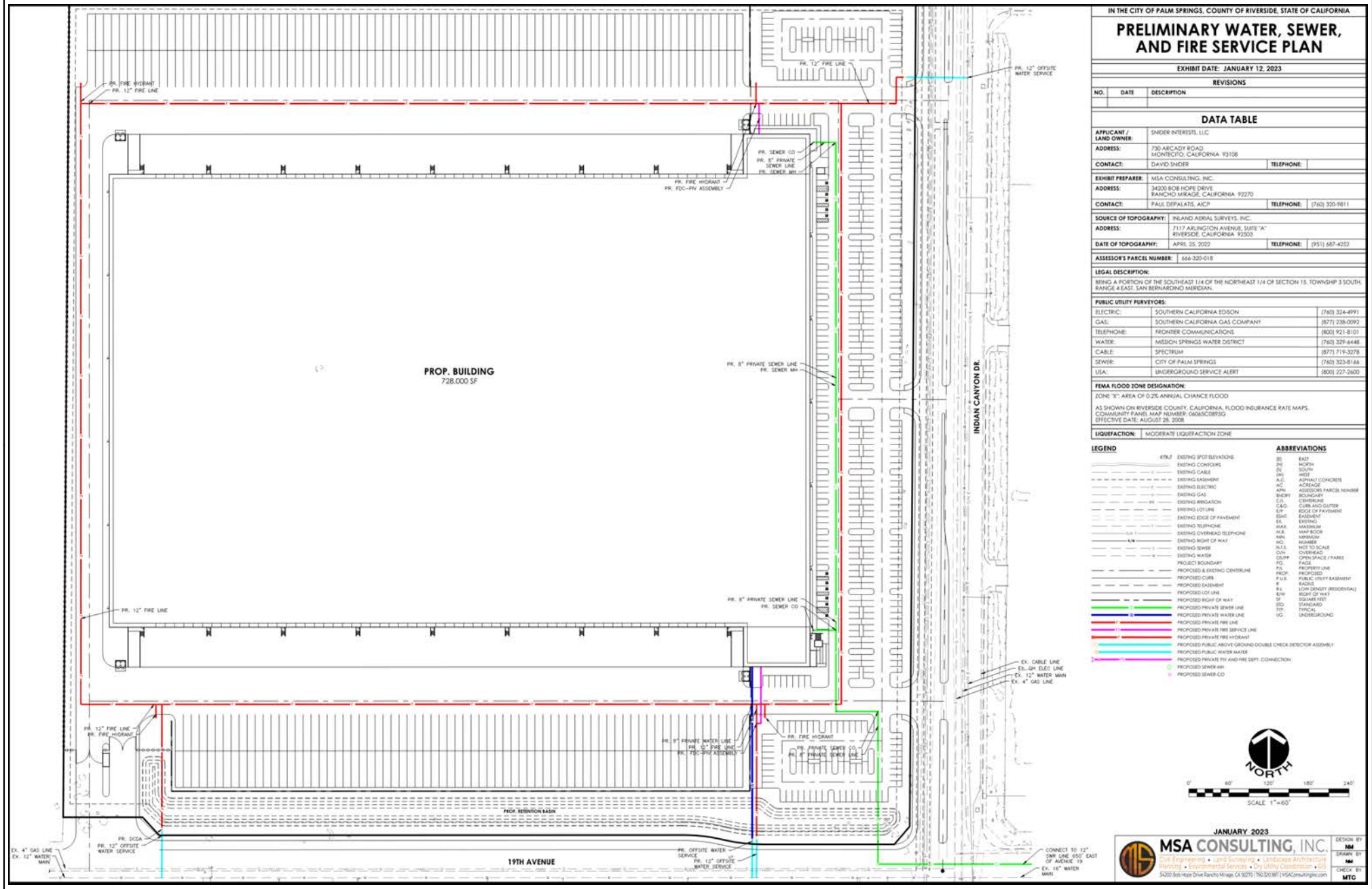
Existing MSWD water infrastructure is located adjacent to the project, along the surrounding roadways. Project water lines will connect to an existing 12-inch water line in 19th Avenue adjacent to the project. A proposed 12-inch water line will extend from the existing water line within the existing right-of-way to an 8-inch private water line within the project boundaries.

A private 12-inch fire line is proposed within the project boundaries. The fire line will connect to the water mains along both 19th Avenue and Indian Canyon Drive. The existing 12-inch and 16-inch water lines along 19th Avenue will connect via a 12-inch water service line near the southeast and southwest corners of the project. The existing 12-inch water line along Indian Canyon Drive will connect to the project's fire line via a 12-inch water service line at the northeast corner of the project. The proposed fire lines will be along the internal paved drive aisles. A fire hydrant is proposed at each corner of the project (four fire hydrants in total).

The project is required to develop a Water Supply Assessment (WSA) / Water Supply Verification (WSV) in order to determine the water demand required for the proposed project. The WSA/WSV evaluates whether the water district and region has enough water to support the site and future development within the planning area. MSWD approved the WSA on November 20, 2023.The project will be required to conform to the requirements of the MSWD's programs and standards pertaining to water management and conservation.

Sanitary sewer service for the project area is provided by MSWD. Sewer connections to the site will occur on 19th Avenue from an existing 6-inch sewer line approximately 650 feet east of the project in 19th Avenue. The project will extend the sewer line to connect to the project. Private internal sewer lines will be 8 inches and occur along the eastern side of the project.

See **Exhibit 3-8** for the ***Conceptual Water, Sewer, and Fire Service Plan***.



IN THE CITY OF PALM SPRINGS, COUNTY OF RIVERSIDE, STATE OF CALIFORNIA

PRELIMINARY WATER, SEWER, AND FIRE SERVICE PLAN

EXHIBIT DATE: JANUARY 12, 2023

REVISIONS

NO.	DATE	DESCRIPTION

DATA TABLE

APPLICANT / LAND OWNER:	SNIDER INTERESTS, LLC		
ADDRESS:	730 ARCADY ROAD MONTECITO, CALIFORNIA 93108		
CONTACT:	DAVID SNIDER	**TELEPHONE:**	
EXHIBIT PREPARER:	MSA CONSULTING, INC.		
ADDRESS:	34200 BOB HOPE DRIVE RANCHO MIRAGE, CALIFORNIA 92270		
CONTACT:	PAUL DEPALATIS, AICP	**TELEPHONE:**	(760) 320-9811
SOURCE OF TOPOGRAPHY:	INLAND AERIAL SURVEYS, INC.		
ADDRESS:	7117 ARLINGTON AVENUE, SUITE "A" RIVERSIDE, CALIFORNIA 92503		
DATE OF TOPOGRAPHY:	APRIL 25, 2022	**TELEPHONE:**	(951) 687-4252
ASSESSOR'S PARCEL NUMBER:	666-320-018		

LEGAL DESCRIPTION:

BEING A PORTION OF THE SOUTHEAST 1/4 OF THE NORTHEAST 1/4 OF SECTION 15, TOWNSHIP 3 SOUTH, RANGE 4 EAST, SAN BERNARDINO MERIDIAN.

PUBLIC UTILITY PURVEYORS:

ELECTRIC:	SOUTHERN CALIFORNIA EDISON	(760) 324-4991
GAS:	SOUTHERN CALIFORNIA GAS COMPANY	(877) 238-0092
TELEPHONE:	FRONTIER COMMUNICATIONS	(800) 921-8101
WATER:	MISSION SPRINGS WATER DISTRICT	(760) 329-6448
CABLE:	SPECTRUM	(877) 719-3278
SEWER:	CITY OF PALM SPRINGS	(760) 323-8166
USA:	UNDERGROUND SERVICE ALERT	(800) 227-2600

FEMA FLOOD ZONE DESIGNATION:

ZONE "X": AREA OF 0.2% ANNUAL CHANCE FLOOD

AS SHOWN ON RIVERSIDE COUNTY, CALIFORNIA, FLOOD INSURANCE RATE MAPS.
COMMUNITY PANEL MAP NUMBER: 06065C0895G
EFFECTIVE DATE: AUGUST 28, 2008

LIQUEFACTION: MODERATE LIQUEFACTION ZONE

LEGEND

678.2 EXISTING SPOT ELEVATIONS
EXISTING CONTOURS
EXISTING CABLE
EXISTING EASEMENT
EXISTING ELECTRIC
EXISTING GAS
EXISTING IRRIGATION
EXISTING LOT LINE
EXISTING EDGE OF PAVEMENT
EXISTING TELEPHONE
EXISTING OVERHEAD TELEPHONE
EXISTING RIGHT OF WAY
EXISTING SEWER
EXISTING WATER
PROJECT BOUNDARY
PROPOSED & EXISTING CENTERLINE
PROPOSED CURB
PROPOSED EASEMENT
PROPOSED LOT LINE
PROPOSED RIGHT OF WAY
PROPOSED PRIVATE SEWER LINE
PROPOSED PRIVATE WATER LINE
PROPOSED PRIVATE FIRE LINE
PROPOSED PRIVATE FIRE SERVICE LINE
PROPOSED PRIVATE FIRE HYDRANT
PROPOSED PUBLIC ABOVE-GROUND DOUBLE CHECK DETECTOR ASSEMBLY
PROPOSED PUBLIC WATER METER
PROPOSED PRIVATE FIV AND FIRE DEPT. CONNECTION
PROPOSED SEWER MH
PROPOSED SEWER CO

ABBREVIATIONS

(E)	EAST
(N)	NORTH
(S)	SOUTH
(W)	WEST
A.C.	ASPHALT CONCRETE
AC	ACREAGE
APN	ASSESSORS PARCEL NUMBER
BNDRY	BOUNDARY
C/L	CENTERLINE
C&G	CURB AND GUTTER
E/P	EDGE OF PAVEMENT
ESMT.	EASEMENT
EX.	EXISTING
MAX.	MAXIMUM
M.B.	MAP BOOK
MIN.	MINIMUM
NO.	NUMBER
N.T.S.	NOT TO SCALE
O/H	OVERHEAD
OS/PP	OPEN SPACE / PARKS
PG.	PAGE
P/L	PROPERTY LINE
PROP.	PROPOSED
P.U.E.	PUBLIC UTILITY EASEMENT
R	RADIUS
R-L	LOW DENSITY (RESIDENTIAL)
R/W	RIGHT OF WAY
SF	SQUARE FEET
STD.	STANDARD
TYP.	TYPICAL
UG	UNDERGROUND

0' 60' 120' 180' 240'
SCALE 1"=60'

JANUARY 2023

MSA CONSULTING, INC.
Civil Engineering • Land Surveying • Landscape Architecture
Planning • Environmental Services • City Utility Coordination • GIS
34200 Bob Hope Drive Rancho Mirage, CA 92270 | (760) 320-9811 | MSAConsultinginc.com

DESIGN BY	NM
DRAWN BY	NM
CHECK BY	MTG

3.7.2 Grading and Drainage

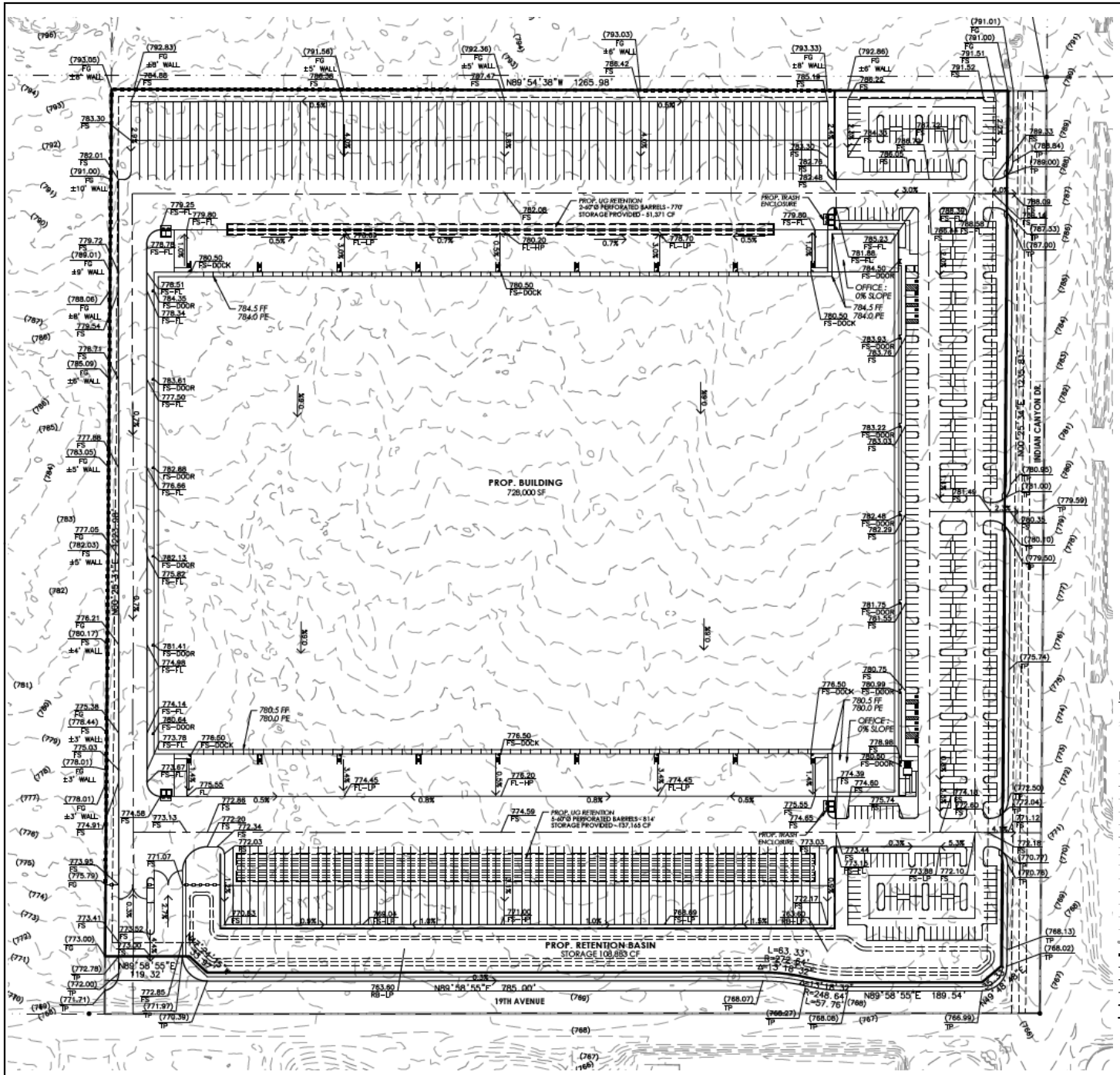
The project site is located on relatively flat land with a 3 percent topographical slope to the southeast. As shown in **Exhibit 3-9, *Conceptual Grading Plan***, the project includes a comprehensive drainage system that collects on- and off-site storm flows, retains the incremental post-development increase and discharges surface water at pre-development levels to protect the proposed buildings as well as downstream properties.

The project site is subdivided into two on-site drainage areas. One drainage area (Drainage Area "A") encompasses the northern portion of the site, while the other drainage area (Drainage Area "B") encompasses the southern portion. Both drainage areas include underground storage, however, a landscaped basin (aboveground) has also been designed in Drainage Area B. The underground storage and landscaped retention basin have been designed to convey and safely capture surface flows. The proposed drainage system was sized to provide storage of the 100-year controlling storm event, as required by the City of Palm Springs. Offsite tributary flood flows will be conveyed through the site and release along the 19th Avenue street frontage of the site following the historical flow path.

3.7.3 Other Utilities

Electric utilities for the site are provided by Southern California Edison (SCE). The project site is not currently provided with electric utilities. Therefore, the site will tie into existing electric infrastructure located on Indian Canyon Drive.

The site is within the Southern California Gas Company's service area for natural gas, Spectrum for cable, and Frontier Communications for telecommunications. Cable and telecommunications lines located along Indian Canyon Drive will provide the project with telecommunication infrastructure.



IN THE CITY OF PALM SPRINGS, COUNTY OF RIVERSIDE, STATE OF CALIFORNIA

PRELIMINARY GRADING PLAN

EXHIBIT DATE: DECEMBER 30, 2021

REVISIONS

NO.	DATE	DESCRIPTION

DATA TABLE

APPLICANT / LAND OWNER:	SNIDER INTERESTS, LLC		
ADDRESS:	730 ARCADY ROAD MONTECITO, CALIFORNIA 93108		
CONTACT:	DAVID SNIDER	**TELEPHONE:**	
EXHIBIT PREPARER:	MSA CONSULTING, INC.		
ADDRESS:	34200 BOB HOPE DRIVE RANCHO MIRAGE, CALIFORNIA 92270		
CONTACT:	PAUL DEPALATIS, AICP	**TELEPHONE:**	(760) 320-9811
SOURCE OF TOPOGRAPHY:	INLAND AERIAL SURVEYS, INC.		
ADDRESS:	7117 ARLINGTON AVENUE, SUITE "A" RIVERSIDE, CALIFORNIA 92503		
DATE OF TOPOGRAPHY:	APRIL 25, 2022	**TELEPHONE:**	(951) 687-4252
ASSESSOR'S PARCEL NUMBER:	666-320-018		

LEGAL DESCRIPTION:

BEING A PORTION OF THE SOUTHEAST 1/4 OF THE NORTHEAST 1/4 OF SECTION 15, TOWNSHIP 3 SOUTH, RANGE 4 EAST, SAN BERNARDINO MERIDIAN.

PUBLIC UTILITY PURVEYORS:

ELECTRIC:	IMPERIAL IRRIGATION DISTRICT	(760) 335-3640
GAS:	SOUTHERN CALIFORNIA GAS COMPANY	(877) 238-0092
TELEPHONE:	FRONTIER COMMUNICATIONS	(800) 921-8101
WATER:	MISSION SPRINGS WATER DISTRICT	(760) 329-6448
CABLE:	SPECTRUM	(877) 719-3278
SEWER:	VALLEY SANITARY DISTRICT	(760) 238-5400
USA:	UNDERGROUND SERVICE ALERT	(800) 227-2600

FEMA FLOOD ZONE DESIGNATION:

ZONE "X": AREA OF 0.2% ANNUAL CHANCE FLOOD

AS SHOWN ON RIVERSIDE COUNTY, CALIFORNIA, FLOOD INSURANCE RATE MAPS, COMMUNITY PANEL MAP NUMBER: 06065C0895G
EFFECTIVE DATE: AUGUST 28, 2008

LIQUEFACTION:	MODERATE LIQUEFACTION ZONE
SCHOOL DISTRICT:	PALM SPRINGS UNIFIED

NOTES:
1. THIS MAP INCLUDES THE ENTIRE CONTIGUOUS OWNERSHIP OF THE LAND DIVIDER. LAND DIVIDER.

LEGEND

- 679.3 — EXISTING SPOT ELEVATIONS
- EXISTING CONTOURS
- EXISTING EASEMENT DELTA
- C — EXISTING CABLE
- DRN — EXISTING IRRIGATION DRAIN LINE
- EXISTING EASEMENT
- E — EXISTING ELECTRIC
- G — EXISTING GAS
- IRR — EXISTING IRRIGATION
- EXISTING LOT LINE
- EXISTING EDGE OF PAVEMENT
- T — EXISTING TELEPHONE
- O/H T — EXISTING OVERHEAD TELEPHONE
- R/W — EXISTING RIGHT OF WAY
- S — EXISTING SEWER
- FM — EXISTING SEWER FORCE MAIN
- W — EXISTING WATER
- EXISTING PROJECT BOUNDARY
- PROPOSED PROJECT BOUNDARY
- PROPOSED AND EXISTING CENTER LINE
- PROPOSED CURB
- PROPOSED EASEMENT
- PROPOSED LOT LINE
- PROPOSED RIGHT OF WAY
- (23) PROPOSED PARKING STALLS

ABBREVIATIONS

(E)	EAST
(N)	NORTH
(S)	SOUTH
(W)	WEST
A.C.	ASPHALT CONCRETE
AC	ACREAGE
APN	ASSESSORS PARCEL NUMBER
BNDRY	BOUNDARY
C/L	CENTERLINE
C&G	CURB AND GUTTER
E/P	EDGE OF PAVEMENT
ESMT.	EASEMENT
EX.	EXISTING
MAX.	MAXIMUM
M.B.	MAP BOOK
MIN.	MINIMUM
NO.	NUMBER
N.T.S.	NOT TO SCALE
O/H	OVERHEAD
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TYP.	TYPICAL
UG	UNDERGROUND

MSA CONSULTING, INC.
> PLANNING > CIVIL ENGINEERING > LAND SURVEYING

NORTH
NOT TO SCALE

GRADING PLAN
PALM SPRINGS FULFILLMENT CENTER
EXHIBIT 3-6

3.8 Intended Uses of This EIR

This Draft EIR examines the environmental impacts of the project and identifies feasible measures to mitigate any potentially significant impacts to the maximum extent feasible. The Draft EIR allows the City of Palm Springs, any responsible or trustee agencies, and interested parties to evaluate the proposed project and make informed decisions with respect to the requested entitlements.

The CEQA Guidelines require an EIR to include a statement briefly describing the intended uses of the EIR, including a list of agencies expected to use the EIR in their decision making and the list of the permits and other approvals required for project implementation.

The City of Palm Springs will use this Draft EIR to consider the potential environmental effects of the following proposed discretionary actions:

- Major Development Permit Approval

3.9 Responsible Agencies

Section 15124 (d) of the State CEQA Guidelines requires that the project description in an EIR include a list of permits and other approvals required to implement a proposed project, the agencies expected to use the EIR in their decision making, and related environmental review and consultation requirements. The following are anticipated responsible agencies which may rely on this Draft EIR for their discretionary approvals required to implement the project:

Mission Springs Water District

Review and approval of WSA, design plans for the project's domestic water and wastewater systems and operational permitting.

Colorado Regional Water Quality Control Board (Region 7)

Approval may include but is not limited to General Construction Stormwater Permit. Additionally, approval of a Water Quality Certification under Section 401 of the Clean Water Act may be required to verify compliance with water quality requirements (waste discharge and water quality).

South Coast Air Quality Management District (SCAQMD)

Approval may include but is not limited to the project's Dust Control Plan and authority to construct/permit to operate all stationary sources.

Other Agencies Consulted

Southern California Edison

Approval or certification related to any other applicable general order, rule, or regulation concerning utility modification, conveyance, or delivery.

3.10 Tribal Consultation

Assembly Bill 52 (AB 52) requires consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area of the proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and to receive advice on how best to protect tribal cultural resources. Accordingly, the City sent formal notification to those tribes who requested to receive notice of projects or who are known to be traditionally and culturally affiliated with the geographic area of the project on May 24, 2023.

The 90-day consultation period concluded on August 22, 2023. The City received a letter from the Agua Caliente Band of Cahuilla Indians (ACBCI) requesting formal government to government consultation. During the formal consultation ACBCI requested that a cultural resource monitor from the Tribe and an archaeologist that meets the Secretary of Interior's standards be present during ground-disturbing activities related to the project; that archaeological monitoring be implemented during project-related ground disturbance activities. Additionally, the ACBCI requested that an archaeological monitoring plan be developed in consultation with the Tribe. The ACBCI concluded the AB 52 consultation in their letter dated December 1, 2023. See **Section 4.14, *Tribal Cultural Resources,*** for further information and appropriate mitigation.

Chapter 4.0 Environmental Impact Analysis

4.1 Introduction

This Draft EIR for the project provides analysis of impacts for 15 environmental resource categories under CEQA. **Sections 4.1** through **4.15** discuss the environmental impacts that may result with implementation of the project.

4.2 Resource Categories Addressed in the EIR

The following environmental resource categories are addressed in this chapter:

4.1	Aesthetics	4.9	Hydrology and Water Quality
4.2	Air Quality	4.10	Noise
4.3	Biological Resources	4.11	Population and Housing
4.4	Cultural Resources	4.12	Public Services
4.5	Energy Resources	4.13	Transportation
4.6	Geology and Soils	4.14	Tribal Cultural Resources
4.7	Greenhouse Gas Emissions	4.15	Utilities and Service Systems
4.8	Hazards and Hazardous Materials		

Resource categories excluded as having no potential environmental effects include agriculture and forestry resources, land use and planning, mineral resources, recreation, and wildfires. (Please consult **Appendix A** and **Chapter 6.0, *Effects Found to Have No Impact***).

4.3 Format of the EIR

Each section of this chapter is formatted with the following headings:

- Introduction
- Existing Conditions
- Regulatory Setting
- Project Impact Analysis, including Thresholds of Significance
- Cumulative Impacts
- Mitigation Measures
- Level of Significance After Mitigation
- Resources

Introduction

This section includes a brief introduction of the environmental impact to be analyzed within the section as it pertains to the project and identifies sources used to evaluate the potential environmental effects.

Existing Conditions

This section contains a discussion of the existing conditions, services and physical environment of the project site and vicinity.

Regulatory Setting

This section includes the local, State, and federal regulatory framework utilized in the analysis.

Project Impact Analysis

Thresholds of Significance

Determining the severity of project impacts is fundamental to achieving the objectives of CEQA Guidelines Section 15091, which requires that decision makers mitigate, as completely as is feasible, the significant impacts identified in the EIR. If the EIR identifies any significant unmitigated impacts, CEQA Guidelines Section 15093 requires decision makers approving a project to adopt findings and a statement of overriding considerations that explains why the benefits of the project outweigh the adverse environmental consequences associated with implementation of the project.

The level of significance for each impact examined in the EIR was determined by considering the predicted magnitude of the impact against applicable significance criteria. Thresholds were developed using criteria from the CEQA Guidelines; State, federal, and local regulatory guidance; local/regional plans and ordinances; accepted practices; and consultation with recognized experts.

The following adjectives are used specifically to define the degree of impact used in the Impact Analysis and Mitigation analysis.

An "**adverse**" impact is any negative environmental result of the project, however small. As a disclosure document, the finding of an impact as "adverse" merely indicates that the project will cause an impact to occur compared to existing conditions, even though that impact may be less than significant. For example, the removal of vegetation from a vacant site might be considered adverse (i.e., "negative") but it may not exceed a local threshold such as loss of native plants or plant communities. Therefore, an impact may be adverse without being significant.

A "**significant**" impact is considered a substantial negative effect that exceeds a critical and accepted threshold for significant adverse environmental effects. CEQA defines a significant effect on the environment as "*a substantial or potentially substantial, adverse (i.e., negative) change in any of the physical conditions within the area by the project, including land, air, water, flora, fauna, ambient noise, and objects of historic or aesthetic significance…"* (CEQA Guidelines, Section 15383). As

recommended in the CEQA Guidelines, impacts are also identified as "**potentially significant**" prior to mitigation, which is the standard for determining which potential impacts are studied in the EIR.

Methodology

This section discusses the methodology used during the technical analysis where necessary.

Project Impact

The environmental impact analyses conducted for each environmental topic were undertaken pursuant to the following CEQA Guidelines sections:

- Section 15126, *Consideration and Discussion of Environmental Impacts*
- Section 15126.2, *Consideration and Discussion of Significant Environmental Impacts*

Each environmental impact discussion assesses project specific environmental effects of the proposed project.

The results of the impact analyses discussed under each environmental topic were evaluated for significance relative to thresholds of significance identified at the beginning of each environmental impact discussion. The thresholds of significance presented are consistent with the CEQA Guidelines Appendix G, *Environmental Checklist Form*, and where applicable, also includes quantified performance standards.

Cumulative Impacts

The basis for the cumulative impact analyses provided in this Draft EIR is consistent with Section 15130, *Discussion of Cumulative Impacts*, of the CEQA Guidelines. In particular, Section 15130 (b)(1)(A) as follows:

> *The discussion of cumulative impacts shall reflect the severity of the impacts and their likelihood of occurrence, but the discussion need not provide as much detail as is provided for the effects attributable to the project alone. The discussion should be guided by the standards of practicality and reasonableness and should focus on the cumulative impact to which the identified other projects contribute rather than the attributes of other projects which do not contribute to the cumulative impact.*

This discussion analyzes the project's cumulative impacts in conjunction with the City of Palm Spring General Plan buildout and other factors identified for each environmental topic.

Mitigation Measures

In some cases, following the impact discussion, reference is made to State and federal regulations and agency policies that would fully or partially mitigate the impact. In addition, policies and programs from applicable local land use plans that partially or fully mitigate the impact may be cited. Project-

specific mitigation measures, beyond those contained in other documents, are offset with a summary heading and described using the format presented below:

AES-1 Project-specific mitigation is identified that would reduce the impact to the lowest degree feasible.

Level of Significance After Mitigation

This section identifies the resulting level of significance of the impact following mitigation.

Resources

This section lists the sources used to evaluate the environmental topic. A compilation of the sources can also be found in **Chapter 8.0, *References***, of this EIR.

4.1 Aesthetics

4.1.1 Introduction

This section of the Draft EIR describes the existing aesthetic character of the project site and surrounding area. This section also analyzes the potential impacts to the aesthetic quality of the site and surroundings and determines whether project implementation would result in significant impacts. Descriptions and analysis in this section are based on information contained from photographs from a site inspection completed May 2022, and a project-specific *Photometric Plan,* prepared by Commercial Lighting Industries (**Appendix B**), as well as other planning documents and aerial imagery of the project property and surrounding area.

Sources used in the preparation of this section are identified at the end of the chapter, and in **Chapter 8.0, *References,*** at the end of this EIR.

4.1.2 Existing Conditions

Aesthetic Value and Quality

The perception and uniqueness of scenic vistas and visual character can vary according to location and composition of its surrounding context. The subjective values attributed to views are generally affected by the presence and intensity of neighboring man-made improvements, such as structures, overhead utilities, and landscaping, often in relation to the aesthetic quality offered by a natural background that may include open space, mountain ranges, or a natural landmark feature. The proximity and massing of structures, landscaping and other visual barriers interact with the visibility of surrounding environments to restrict or enhance the value of local views. The evaluation of scenic vistas takes into consideration the physical compatibility of proposed projects in relation to land uses, transportation corridors, or other vantage points, where the enjoyment of unique vistas may exist, such as residential areas or scenic roads.

Existing Conditions

The project site encompasses an area of approximately 38 acres in the western portion of the City of Palm Springs. The local area is characterized as a developing area with industrial and commercial businesses to the east and south, and vacant land to the north and west. The project site has been vacant and undeveloped since at least 1948, based on historical aerial imagery. The site is relatively level, with uniform sandy terrain and scattered vegetation. Sparse small- to medium-sized boulders also exist onsite. Three north-south-trending dirt paths are distinguishable along the west edge, center, and east edge. Soil disturbance and vehicle tracks are indicative of recent activity onsite.

Various deposits of scattered trash and demolition debris exist onsite, mostly along the dirt paths. The discarded items include household refuse (i.e., articles of clothing, plastic trash, etc.). The demolition waste includes broken concrete, asphalt, tile, and gravel in small quantities. Other items include vehicle tires, plastic tubing, and pieces of broken furniture. The northeast portion of the property contains various piles of soil, gravel, and small boulders.

The project's eastern and southern boundaries are Indian Canyon Drive and 19th Avenue, respectively. The western boundary is delineated by chain-link fencing, while the northern boundary abuts vacant and undisturbed land.

The site is currently located within the City of Palm Springs's Industrial land use designation and Manufacturing (M-2) zoning designation. These designations allow the development of industrial facilities within the City, expanding the City's job base and contributing to the City's overall economic vitality and balance of land use.

Topography

The topography of the region progresses from the flat desert floor, where Palm Springs and the project site are located, to the top of dramatic mountaintops that rise over 10,000 feet. The contrast between the flat desert landscape and the mountain peaks surrounding it provides views and picturesque landscapes for residents and visitors. The City of Palm Springs is located adjacent to the San Jacinto Mountains, which reach 10,832 feet, and the Santa Rosa Mountains, which reach 8,717 feet at Toro Peak (southeast of the City boundaries). Additional mountain ranges that contribute to the picturesque landscapes include the San Gorgonio Mountains to the northwest, the Little San Bernardino Mountains to the north, and the Indio Hills to the northeast.

The toe of the San Jacinto Mountains is located approximately 3.26 miles southwest of the project; the Santa Rosa Mountains are approximately 8.50 miles south of the project; the San Gorgonio Mountains are approximately 4.50 miles northwest of the project; the Little San Bernardino Mountains are approximately 5.20 miles north of the project; and Edom Hill is approximately 5.20 miles east of the project.

Review of the USGS topographic map from 1955 and historical aerial from 1953 to 2016 indicates that the site conditions have not changed. The onsite topography is flat, with a 26-foot slope from north to south. Moreover, no topographic or geologic features are mapped on or near the property.

Existing Visual Character

The existing visual character of the area surrounding the project site is defined by both developed and undeveloped properties. Commercial businesses, industrial facilities, wind energy facilities, and vacant lots currently make up the surrounding area. These uses are typical in this area, due to its accessibility to the Interstate 10 freeway and separation from the residential, resort, and downtown areas of Palm Springs. Buildings throughout the City tend to be low-rise, which preserves views of the

surrounding mountains from private and public lands. An interconnected street system provides accessibility throughout the City. Indian Canyon is located east of the project and connects the City in a north-south alignment. According to the City's General Plan, Indian Canyon is considered a Major Thoroughfare.

4.1.3 Regulatory Setting

Regional

Riverside County Western Coachella Valley Area Plan

According to the Riverside County Western Coachella Valley Area Plan, the Interstate 10 freeway is a County Eligible Scenic Highway but is not officially designated. The Interstate 10 freeway is located approximately 0.32 miles south of the project.

Riverside County Ordinance No. 655, Regulating Light Pollution

Riverside County's Ordinance No. 655 is intended to restrict the permitted use of certain light fixtures emitting into the night sky undesirable light rays which have a detrimental effect on astronomical observation and research at Mount Palomar.

As illustrated in Figure 4.4.1 of the Riverside County General Plan Environmental Impact Report (page 4.4-7), Palm Springs lies within Zone B of the Mount Palomar restricted nighttime light zone and projects constructed within the zone must comply with County standards.

Local

Palm Springs General Plan

The Palm Springs General Plan (GP) addresses various elements relevant to the growth of the community including elements specifically relevant to the aesthetic and visual character of the City in the Community Design and Land Use Elements.

The purpose of the Community Design Element is to enhance the current community identity through the identification of design techniques, guidelines, and features that will enhance the City and its neighborhoods. While industrial and business parks generally do not receive the same level of design scrutiny than more visible areas in the community do, the City's Community Design Element influences the appearance of projects. The following goals and policies established in the Community Design Element are relevant to the proposed project:

Goal CD1: Create a safe, aesthetically pleasing community appearance that utilizes high-quality architecture – a hallmark of Palm Springs.

Policy CD1.4: Implement appropriate review procedures that advance the aesthetic quality of the community through high-quality architecture, outstanding site design, and responsiveness to the desert environment.

Policy CD1.5: Encourage the use of natural colors, materials, and textures in public and private development and streetscape improvements to complement the natural environment. Allow for the use of accent colors to complement the desert color palette.

Policy CD1.7: Encourage design of visually attractive retention/detention basins.

Goal CD7: Use both public and private landscaping along streets, sidewalks, and property frontages to strengthen the existing City identity and ensure a pleasant environment.

Policy CD7.1: Encourage the use of native desert plants and trees that require minimal water and maintenance.

Goal CD21: It is a goal of the City of Palm Springs to create convenient, attractive, and well-designed industrial and business parks.

Policy CD21.2: Encourage clean and distinctive industrial/office buildings with clearly visible entrances.

Policy CD21.3: Avoid the use of long, blank walls by breaking them up with vertical and horizontal façade articulation achieved through stamping, colors, materials, modulation, and landscaping.

The Land Use Element constitutes the physical framework for the General Plan. The land use plan designates the general location, distribution, and extent of land uses. The Land Use Element ensures that conflicting uses are not located adjacent to each other, and outlines goals, policies, and programs within each land use category. The following goals and policies established in the Land Use Element are relevant to the proposed project:

Goal LU3: Attract and retain high-quality industrial and business park development.

Policy LU3.1: Encourage well-planned research and development areas and business parks that contain coordinated design guidelines and enhanced amenities.

Policy LU3.2: Promote opportunities for expansion and revitalization of industrial uses within the City.

Policy LU3.3: Ensure operation of industrial uses is unobtrusive to surrounding areas and prohibit the development of manufacturing uses that operate in a manner or use materials that may impose a danger on adjacent uses or are harmful to the environment.

Palm Springs Municipal Code

The Palm Springs Municipal Code (MC) acts as a regulatory standard, compliant with State and federal laws, for the City of Palm Springs. The MC regulates businesses, zoning, animals, vehicles and traffic, peace and morals, health and sanitation, and more. Regulations regarding design standards and guidelines are provided throughout the MC. Regulations include:

Chapters 91 through 94, *Zoning Code,* of the Palm Springs MC establish design requirements and standards for properties within the various zones in the City. Design guidelines and standards in the Palm Springs MC limit building setbacks, building height, materials and height of fences and walls, lot and building dimensions, and lighting standards.

4.1.4 Project Impact Analysis

Thresholds of Significance

According to the CEQA Guidelines' Appendix G Environmental Checklist, to determine whether impacts to aesthetics are significant environmental effects, the following questions are analyzed and evaluated. Would the Project:

a) Have a substantial adverse effect on a scenic vista?

b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway?

c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning 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?

Prior to the preparation of the Draft EIR, the Palm Springs Fulfillment Center Initial Study and Notice of Preparation (NOP) were prepared. The Initial Study and NOP are included in **Appendix A** of this Draft EIR. Following the screening criterion related to aesthetics in the Initial Study, threshold topic "b" does not require additional analysis in this Draft EIR for the reasons described below.

Threshold "b": *Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway:*

- The property does not contain any landmarks or scenic resources, such as trees, rock outcroppings, or historic buildings that may be altered or damaged by utilization of the site. A review of the California State Scenic Highway Program determined that the project site is not located within a designated State Scenic Highway.

Methodology

The analysis of the potential aesthetic impact of the proposed project is provided in the following discussion. Aesthetic impacts are evaluated by considering proposed grading, landform alteration, building setbacks, scale, massing, typical construction materials, and landscaping features associated with the design of the project. The project's impact on scenic vistas and the existing visual character are objectively examined to determine whether development of the project would have significant impacts on the property and surrounding area.

Project Impacts

a. Have a substantial adverse effect on a scenic vista?

Natural scenic vistas can be influenced both negatively and positively by man-made features. such as overhead power lines, landscaping and additional improvements. The evaluation of scenic vistas takes into consideration the physical compatibility of proposed projects in relation to land uses, transportation corridors, or other vantage points, where the enjoyment of unique vistas may exist, such as residential areas or scenic roads.

The mountains surrounding the City of Palm Springs include the San Jacinto Mountains on the west, the Santa Rosa Mountains to the south, and more distantly, the Little San Bernardino Mountains to the north. The San Jacinto and Santa Rosa Mountains National Monument and San Jacinto State Park are recognized as outstanding and unique scenic resources in Palm Springs. Within the National Monument, the State of California has designated two sites as wildlife-viewing areas: the Palms to Pines Scenic Byway and the Mount San Jacinto Park. The Palms to Pines Scenic Byway is located approximately 18.6 miles southeast of the project, and the Mount San Jacinto Park is located approximately 14.5 miles southwest of the project. Due to the distances of the viewing areas to the project, the project will not result in impacts to these wildlife-viewing areas.

Palm Springs has a number of developing light industrial and business parks within its boundaries. The majority of these new industrial and business parks are located around the airport and along I-10, Gene Autry Trail, and Indian Canyon Drive. The Palm Springs General Plan establishes goals and policies to reduce impacts on aesthetic resources, as described above. Further, the Zoning Code establishes standards and guidelines, such as limiting structure height and controlling building mass and scale, for various zones within the City.

The surrounding mountains contribute to the scenic vista observed in Palm Springs and near the project site. From the project property, the San Jacinto Mountains to the southwest are largely visible, without major interruptions. From viewpoint locations along Indian Canyon Drive, the toe of slope to the peak of the Mountain is visible. From the project site, the Santa Rosa Mountains to the south and interrupted by existing buildings, landscaping, infrastructure (i.e., utility poles, utility substation,

streetlights, wind turbines), and topography. However, depending on viewpoint location (i.e., northern part of the property versus southern part of the property), the mid-range and peak views can be observed from the project. The San Gorgonio Mountains to the northwest, and the Little San Bernardino Mountains to the north are also distant and visible from the project property. Similar to the views of the San Jacinto and Santa Rosa Mountains, base views of the San Gorgonio Mountains and Little San Bernardino Mountains, are obstructed by existing infrastructure (i.e., wind turbines, traffic lights, existing structures and facilities, vegetation, and topography). However, mid-range and peak views of these mountains are visible from the project site.

Impacts to Adjacent Public Rights-of-Way

As stated previously, the proposed project is located west of Indian Canyon Drive and north of 19th Avenue. According to the Palm Springs General Plan, scenic vistas are viewed from the roadways in the City and should be preserved. The following discussion analyzes the project's impact on scenic vistas on the public rights-of-ways adjacent to the project property.

Indian Canyon Drive

Indian Canyon Drive extends a distance of approximately 1,300 feet along the project's eastern frontage. The proposed project building frontage extends approximately 800 feet along Indian Canyon Drive. The building will be set back approximately 152 to 156 feet from the proposed sidewalk adjacent to the right-of-way and will be 50 feet in height. From the segment of Indian Canyon Drive adjacent to the project site, views of the Little San Bernardino Mountains to the north, San Gorgonio Mountain to the northwest, San Jacinto Mountain to the southwest, and Santa Rosa Mountains to the southwest are distant and visible from the project site, depending on viewpoint location. Existing vegetation, buildings, and manmade infrastructure partially obstruct the base views of the regional landforms; however, the obstructions do not diminish the panoramic views due to the scale and massing of the surrounding mountains.

The project site is located immediately west of Indian Canyon Drive. Currently, the vacant and undeveloped character of the project site does not obstruct views of the mountains from motorists traveling along the adjacent roadway. **Exhibits 4.1-1** through **4.1-5** illustrate the existing views of the mountains from the segment of Indian Canyon Drive[1].

Development of the project will partially obstruct the views of the San Jacinto Mountains to the southwest, San Gorgonio Mountain to the northwest, Little San Bernardino Mountains to the north, and the Santa Rosa Mountains to the southwest from the adjacent segment of Indian Canyon Drive, since the project site does not currently obstruct views to the southwest and northwest.

[1] Images taken from Google Maps application. Location from the center of the eastern and southern boundaries of the project site (i.e., Indian Canyon Drive and 19th Avenue, respectively).

The project proposes one 739,360-square-foot building with associated improvements such as paved parking spaces, internal drive aisle, and landscaping. As previously stated, the proposed building will be 50-feet in height, and setback approximately 152 to 156 feet from the proposed sidewalk along Indian Canyon Drive. The project will block midrange and baseline views of the San Jacinto and Santa Rosa Mountains from pedestrians and motorists traveling southbound on Indian Canyon Drive. Similarly, the project will block midrange and baseline views of the San Bernardino and San Gorgonio Mountains from pedestrians and motorists traveling northbound on Indian Canyon Drive. The proposed 50-foot building will block these views for a distance of approximately 800 feet (i.e., the building length along Indian Canyon Drive). These obstructed views would be similar to those observed along Indian Canyon Drive, south of 19th Avenue, where existing commercial and industrial buildings are located adjacent to the right-of-way. The project's building will be set back approximately 152 to 156 feet from the right-of-way. This setback will reduce the scale of the building by placing it further away from the right-of-way, therefore, reducing the building mass viewed by the motorists. The setbacks will also allow the peaks of the mountains to be visible along the right-of-way. It should also be noted that it will take approximately 16 seconds for motorists traveling along Indian Canyon Drive to pass the project site (using distance / speed (55 mph) = time). Finally, unobstructed views of the Little San Bernardino Mountains to the north, and Santa Rosa Mountains to the south will remain visible, due to the orientation of the project along Indian Canyon Drive. Therefore, impacts will be less than significant.

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> PLANNING > CIVIL ENGINEERING > LAND SURVEYING

VIEW OF LITTLE SAN BERNARDINO MT (NORTH) FROM INDIAN CANYON DR.
PALMS SPRINGS FULFILLMENT CENTER
EXHIBIT 4.1-1

MSA CONSULTING, INC.
> PLANNING > CIVIL ENGINEERING > LAND SURVEYING

VIEW OF INDIO HILLS (NORTHEAST) FROM INDIAN CANYON DR.
PALMS SPRINGS FULFILLMENT CENTER
EXHIBIT 4.1-2

MSA CONSULTING, INC.
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VIEW OF SANTA ROSA MT (SOUTH) FROM INDIAN CANYON DR.
PALMS SPRINGS FULFILLMENT CENTER
EXHIBIT 4.1-3

MSA CONSULTING, INC.
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VIEW OF SAN JACINTO MT (SOUTHWEST) FROM INDIAN CANYON DR.
PALMS SPRINGS FULFILLMENT CENTER
EXHIBIT 4.1-4

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VIEW OF SAN GORGONIO MT (NORTHWEST) FROM INDIAN CANYON DR.
PALMS SPRINGS FULFILLMENT CENTER
EXHIBIT 4.1-5

19th Avenue

19th Avenue extends a distance of approximately 1,300 feet along the project's southern frontage. The proposed project building frontage extends approximately 1,000 feet along 19th Avenue. The building will be set back approximately 266-312 feet from the property boundary and will be 50 feet in height. From the segment of 19th Avenue adjacent to the project site, views of Little San Bernardino Mountains to the north and northeast, and San Gorgonio Mountain to the northwest are largely unobstructed. The Santa Rosa Mountains to the south and San Jacinto Mountains to the southwest are obstructed by existing buildings and landscaping. However, depending on viewpoint location, mid-range and peak views of these mountains can be observed along 19th Avenue. **Exhibits 4.1-7** through **4.1-11** illustrate the views of the above mountains from the segment of 19th Avenue, immediately south of the project[2].

Development of the project will not further obstruct views of the Santa Rosa and San Jacinto Mountains since the project is located north of 19th Avenue. Development of the proposed project will partially obstruct views of the San Gorgonio Mountains and Little San Bernardino Mountains when observed from 19th Avenue. However, the project proposes an approximately 266-foot and 312-foot setback from the proposed building to the proposed sidewalk along 19th Avenue.

The project property does not currently obstruct views of the landforms oriented north of the project site, due to the site's vacant and undeveloped condition. Development of the proposed project would result in new obstructions to the midrange and baseline views of the San Gorgonio Mountains and Little San Bernardino Mountains northwest and north of the project (respectively) from pedestrians and motorists traveling along 19th Avenue. The proposed 50-foot high building will block these views for a distance of approximately 1,000 feet. The building will be set back approximately 266-312 feet from the southern property boundary. This setback will reduce the scale of the building by placing it further away from the right-of-way, therefore, reducing the building mass viewed by the motorists. The setbacks will also allow the peaks of the mountains to be visible along the right-of-way. The interruption of the views will be brief for passing vehicles traveling along 19th Avenue, and impacts will be less than significant.

[2] Images taken from Google Maps application. Location from the center of the eastern and southern boundaries of the project site (i.e., Indian Canyon Drive and 19th Avenue, respectively).

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VIEW OF LITTLE SAN BERNARDINO MT (NORTH) FROM 19TH AVENUE
PALMS SPRINGS FULFILLMENT CENTER
EXHIBIT 4.1-6

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VIEW OF INDIO HILLS (NORTHEAST) FROM 19TH AVENUE
PALMS SPRINGS FULFILLMENT CENTER
EXHIBIT 4.1-7

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VIEW OF SANTA ROSA MT (SOUTH) FROM 19TH AVENUE
PALMS SPRINGS FULFILLMENT CENTER
EXHIBIT 4.1-8

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VIEW OF SAN JACINTO MT (SOUTHWEST) FROM 19TH AVENUE
PALMS SPRINGS FULFILLMENT CENTER
EXHIBIT 4.1-9

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VIEW OF SAN GORGONIO MT (NORTHWEST) FROM 19TH AVENUE
PALMS SPRINGS FULFILLMENT CENTER
EXHIBIT 4.1-10

Overall, the project may obstruct the mountains to the north, northwest, and southwest when viewed from public rights-of-way, however, this obstruction will be brief for the pedestrian or motorist travelling along these rights-of-way. The proposed project will not further obstruct views of the Santa Rosa Mountains to the south when viewed from the public rights-of-way.

Impacts to Off-Site Properties

Properties surrounding the project primarily consist of vacant land to the north, developed and developing industrial and commercial businesses to the east and south, and a fenced wind energy property to the west. The property east of the project (separated by Indian Canyon Drive) is within the Coachillin Specific Plan, in the City of Desert Hot Springs's jurisdiction, and is developing with similar industrial buildings. The following discussion analyzes the project's impacts to scenic vistas relative to the northern, eastern, western, and southern properties.

Northern Properties

The properties north of the project site are vacant and undeveloped. From the northern properties, distant views of the Little San Bernardino Mountain are visible to the north, peak and mid-range views of the Santa Rosa Mountains are visible to the south, the San Jacinto Mountains are visible to the southwest, and the San Gorgonio Mountains are visible to the northwest. Views of the surrounding landforms are marginally obstructed by existing structures and developments, manmade infrastructure primarily to the north. Even with these obstructions, peak and mid-range views of the landforms remain largely visible.

The project, which proposes a 50-foot high, approximately 739,360-square-foot building, would further obstruct the views of the Santa Rosa and San Jacinto Mountains to the south and southwest, respectively, when viewed from the northern property. However, the project proposes an approximately 196-foot and 258-foot setback from the northern property boundary line. These setbacks will reduce the scale of the building by placing it further away from the property line, therefore, reducing impacts viewed by the northern property. The setbacks will also allow the peaks of the mountains to be visible from the northern property. Although the project building will obstruct baseline and midrange views of the south-lying mountains, peak views will remain visible and development of the proposed project would not result in significant impacts to the scenic vista.

Eastern Properties

Properties to the east of the project include the Coachillin Business Park project within the City of Desert Hot Springs' jurisdiction. The Coachillin Business Park is separated from the project by Indian Canyon Drive and includes undeveloped and developed parcels within the Specific Plan area. Coachillin is surrounded by decorative block walls and fencing. From this property, views of the surrounding mountains are largely unobstructed, however, views to the south and southwest are obstructed by existing structures, manmade infrastructure, walls, landscaping, and vegetation.

Development of the project would not result in impacts to the scenic vistas to the northwest, north, northeast, and south. The San Jacinto Mountains are located southwest of the east property, and when viewed from the eastern property, midrange and peak views of the Mountains are largely unobstructed. The proposed 50-foot tall, approximately 739,360-square foot building would partially obstruct the views of the San Jacinto Mountains depending on the location of viewpoint on the eastern property. If standing at the southwestern side of the eastern property, it is likely that the building associated with the proposed project would partially obstruct the base views of the Mountain. Additionally, the project's proposed building is further separated from the eastern property by approximately 95 feet of right-of-way (i.e., Indian Canyon Drive). The Coachillin Business Park, to the east, is set back approximately 35 feet from Indian Canyon Drive (measured from right-of-way to Coachillin perimeter wall since there are no existing buildings along the frontage of Indian Canyon Drive). As previously stated, the project building is proposed to be set back by approximately 152 to 156 feet from the proposed sidewalk along Indian Canyon Drive. This will result in an approximately 330-foot separation between the Coachillin perimeter wall and the proposed project building. Development of the 50-foot high building would result in baseline and midrange obstructions to the mountains southwest and west of Coachillin (i.e., San Jacinto Mountains and San Gorgonio Mountains). However, peak views of these mountains would remain visible from Coachillin, therefore, the project would result in less than significant impacts to scenic vistas when observed from the eastern property.

Southern Properties

Properties to the south include two commercial businesses and a vacant parcel, separated from the project site by 19th Avenue. From the southern properties, views of the San Gorgonio Mountains and Little San Bernardino Mountains are visible to the north, the Santa Rosa Mountains are partially visible to the south, and the San Jacinto Mountains are visible to the southwest. The surrounding mountains are partially obstructed by existing structures, landscaping, vegetation, and manmade infrastructure (i.e., electric utility power poles, wind turbines, substations). These existing conditions partially obstruct the baseline and mid-range views of the surrounding mountains.

Development of the project would not result in impacts to the scenic vistas to the south and southwest of the project site because the project site is located to the north. The San Gorgonio Mountains, and Little San Bernardino Mountains are located to the northwest and north, respectively. When viewed from the southern property, the base views of landforms are marginally obstructed by existing developments, topography infrastructure, and landscaping/vegetation. However, midrange and peak views of the landforms are unobstructed. The project would partially obstruct the base views of north-lying landforms. However, the proposed project will be separated from the southern properties by the 19th Avenue right-of-way and will include a 266-foot and 312-foot setback from the southern property line (two setbacks include the office portion of the building and the industrial building loading docks). The two existing buildings to the south are set back from the project's

southern property line by approximately 70 and 240 feet, respectively. This separation reduces impacts of the proposed buildings from the southern property's view of north-lying landforms by placing the building further away from the property line, therefore, reducing the building mass viewed by the southern properties. Although the project building will obstruct baseline and midrange views of the south-lying mountains, peak views will remain visible, and development of the proposed project would not result in significant impacts to the scenic vista.

Western Properties

A wind turbine property is located to the west of the project. Scenic vistas at the western property would not be significantly impacted by development of the proposed project because the Santa Rosa Mountains are located to the south, the San Jacinto Mountains are located to the west, and the Little San Bernardino Mountains are located to the north. The project is oriented east of the wind turbine property, therefore, the project would not result in impacts to scenic vistas from this property.

Overall, the project's impact to scenic vistas will be less than significant.

c. In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from a 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?

Per California Code of Regulations, Section 15387, an "urbanized area" is a central city or a group of contiguous cities with a population of 50,000 or more, together with adjacent densely populated areas having a population density of at least 1,000 persons per square mile. The City of Palm Springs had a population of 47,427 people in 2020, according to the Palm Springs Housing Element (2023). The City's population increases to over 75,000 people during winter. Therefore, the City, and project site, are located in an urbanized area. Existing industrial and commercial businesses are located south of the project. Areas north and west of the project are vacant. Properties east of the project are defined by the Coachillin Business Park Specific Plan, within the City of Desert Hot Springs' jurisdiction and separated by Indian Canyon Drive.

Manufacturing Zone

The project site, and areas north, west, and south of the project site are located within the City of Palm Springs' Manufacturing (M-2) zoning designation. According to the Palm Springs' Municipal Code, M-2 zoning designations are intended to provide for development of warehouse and distribution centers, and industrial uses which include fabrication, manufacturing, assembly or processing.

The project proposes a maximum building height of 50 feet. The project complies with the building heights established in the Municipal Code. The Palm Springs Municipal Code Section 92.14.1.00 through 92.17.1.05 establishes the standards and guidelines for properties within the City's Manufacturing (M-2) zoning designation. Per Section 92.17.1.03, Property Development Standards, building heights within M-2 zones shall not be greater than 30 feet. However, an exception applies to areas bounded by 18th Avenue on the north, Indian Canyon Drive on the east, and 19th Avenue to the south, where buildings over 40 feet in height are permitted (Section 92.17.1.03(C)(2)(d)). The exception applies to the project area because the site lies within the boundary of the area excluded from the M-2 building height standard (i.e., bounded by Indian Canyon Drive to the east and 19th Avenue to the south). Section 92.17.1.03 (C)(2)(d) does not establish a maximum building height for this area. Thus, the project's building height of 50 feet complies with the development standards in the City's Municipal Code.

The Municipal Code establishes setback requirements for M-2 zones in the City, and requires a minimum setback of 25 feet from a building to the property line. The setback from Indian Canyon Drive to the project's building varies from approximately 152 feet to approximately 156 feet (building to property line). The southern project boundary is located adjacent to 19th Avenue. The building setback from 19th Avenue varies from 266 feet to 312 feet (building to property line). The building setbacks from the northern property line and western property line are 196 and 258 feet, and 62 feet and 67 feet, respectively. The proposed building setbacks are compliant with the zoning code established in the Palm Springs Municipal Code.

Lot size

The minimum lot area for M-2 zones is 40,000 square feet; the minimum lot width is 200 feet, and the minimum depth is 200 feet. This is indicated in the table below.

Table 4.1-1 Lot Area, Width and Depth Requirements

Zone	Minimum Lot Area (SF)	Minimum Lot Width (ft)	Minimum Lot Depth (ft)
M-2	40,000 SF	200 ft	200 ft

The project lot width is approximately 1,253 feet, and the lot depth is approximately 1,272 feet, occupying approximately 1,588,466 square feet (net). Therefore, the project is compliant with the lot area, width and depth requirements shown in **Table 4.1-1** for M-2 zones established in the Municipal Code.

Landscaping

Municipal Code Chapter 8.60 establishes general guidelines for the planting and care of landscaping and irrigation in the City. Section 8.60.060, *Landscape design plan*, requires that landscaping be designed and constructed to the highest level of aesthetic values and water efficiency. Project

landscaping is proposed to occur along the Indian Canyon Drive and 19th Avenue street frontages along the property's eastern and southern boundaries, respectively. Landscaping will consist of trees, such as date palms, willow acacia, palo verde, and mesquite, to provide shade throughout the parking area for vehicles and pedestrians. Proposed shrubs will include outback sunrise emu bush, new gold latana, Lindheimer's muhly, and firecracker plant, while accent plants will consist of agave, barrel cactus, aloe, and yucca. The trees, with the blooming shrubs and accent plants would enhance the project frontage, while creating a natural screen of the proposed fulfillment center building. The trees are proposed along the eastern building frontage, in the parking areas on medians, and along the retention basins. The shrubs, accents, and groundcovers are proposed along the project eastern and southern frontages, parking areas, and retention basin. The proposed landscape includes low water use and low maintenance plantings. The project's landscape complies with the requirements established in the Municipal Code. The landscape plan will be reviewed and approved by the City as a condition of project approval.

In addition to the project's compliance with Chapter 8.60, the project will also be required to comply with the development and performance standards established in Section 92.17.1.03, *Property development standards,* of the Municipal Code. These standards include guidelines for walls, fences, and landscaping (Section 93.02.00), off-street loading and trash enclosures (Section 93.07.00), signs (Section 93.20.00), and outdoor lighting standards (Section 93.21.00). Review of the final building plans for the project will be required prior to commencement of construction.

Design Features

The proposed development will be cohesive and complementary to the adjacent land uses by incorporating improvements such as landscaping and fencing along the perimeter of the project. The proposed project will include materials such as concrete in neutral colors such as beige, browns, and dark/olive green, metal painted white, anodized aluminum storefront windows, and stone accents. The natural colors of the proposed buildings will complement the existing landscape and the proposed landscaping. **Exhibit 4.1-11** and **4.1-12** illustrate the building elevations and proposed materials. The proposed project will maintain visual consistency and scenic quality in this part of the City.

As discussed in detail above, the proposed project is consistent with the visual character of the area. The project's perimeter landscaping, fencing, and the entry points will be similar in appearance and quality to the existing industrial properties to the south and throughout the City. Impacts associated with visual character will be less than significant.

Perspective View at Indian Canyon Drive

East Elevation at Indian Canyon Drive

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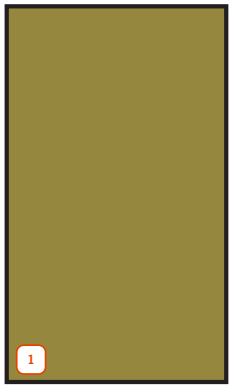
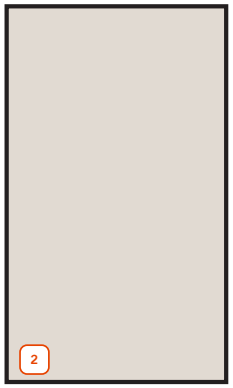
PERSPECTIVE VIEW AND ELEVATIONS AT INDIAN CANYON DR.

PALMS SPRINGS FULFILLMENT CENTER

EXHIBIT 4.1-11



ACCENT PAINT ON CONCRETE
SHERWIN WILLIAMS
SW 6411
BENGAL GRASS



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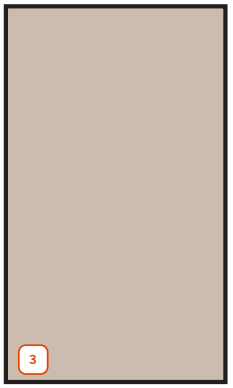

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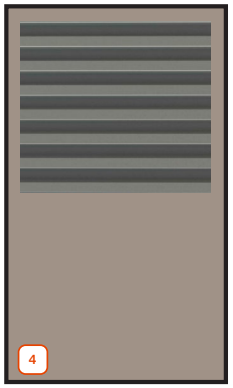
PERFECT GREIGE



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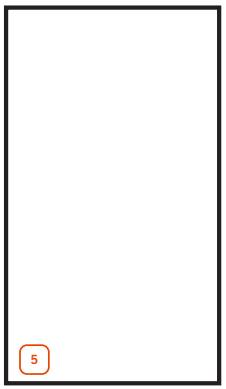
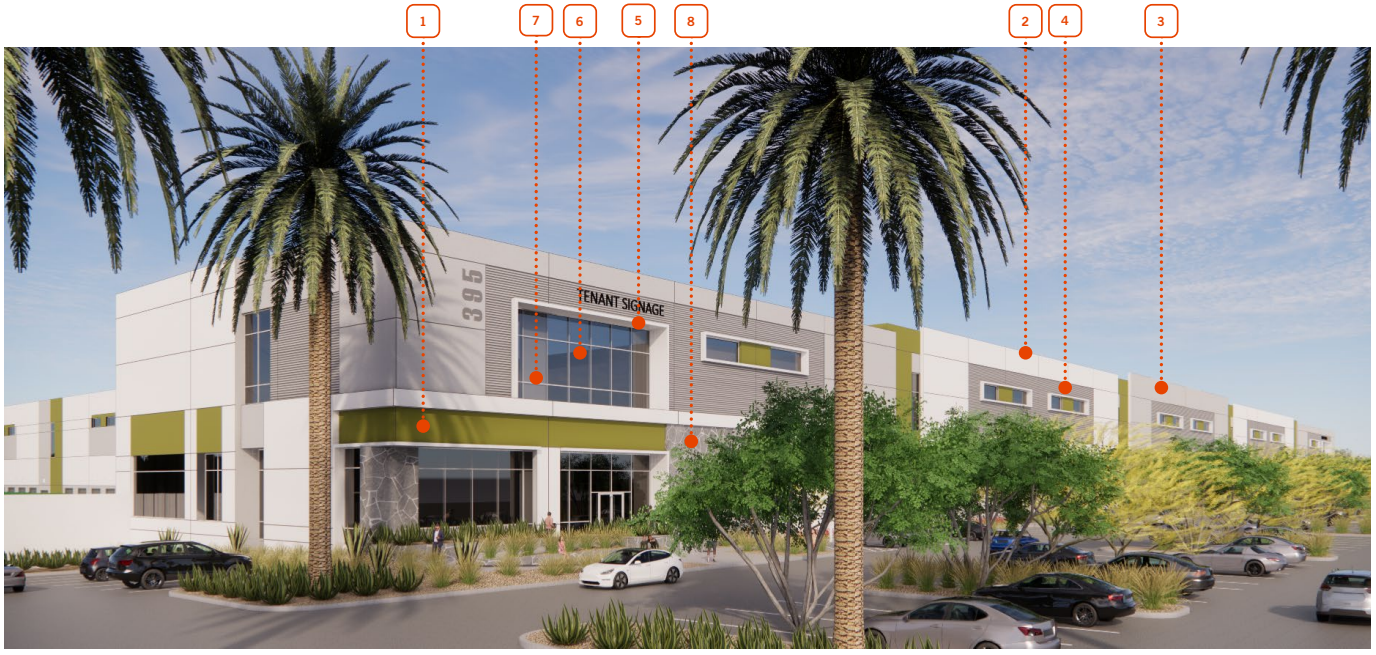
SHERWIN WILLIAMS
SW 9169
CHATURA GRAY

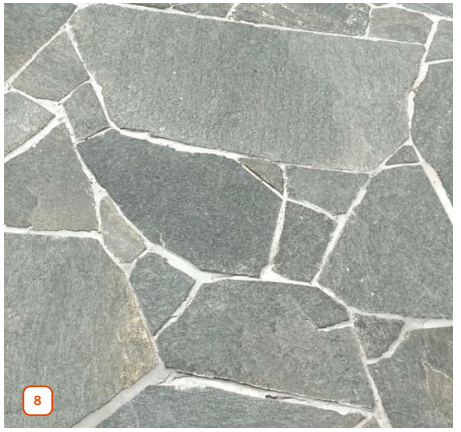


METAL TRIM
WHITE

VITRO INSULATED ARCHITECTURAL GLASS
VISTACOOL (2) PACIFICA

CLEAR ANODIZED ALUMINUM STOREFRONT





STONE ACCENT
STONE DEPOT
MANGOLIA LIMESTONE-NATURAL SPLIT

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> PLANNING > CIVIL ENGINEERING > LAND SURVEYING

PROPOSED BUILDING MATERIALS
PALMS SPRINGS FULFILLMENT CENTER
EXHIBIT 4.1-12

d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

The project site does not currently have existing sources of lighting. Presently, existing sources of fixed nighttime lighting in the project vicinity can be attributed to the existing industrial and commercial businesses located south and east of the project. Additional lighting in industrial areas typically consists of overhead/downward-orienting lamp posts in parking areas, low-intensity, wall-mounted lighting fixtures at building entrances, illuminated signage, and lamp posts along pedestrian pathways.

The vacant property to the north does not contribute to the area's existing ambient lighting, similar to the project site. Wind turbine systems, like those located west of the project, typically consist of blinking or flashing red lights at the top of select turbines. Street lighting (i.e., light posts) occur along 19th Avenue and a traffic signal is located at the northeast corner of the project. Day-time glare and night-time lighting can be attributed to vehicular traffic on area roadways.

Development of the project will introduce additional light to the area. During the period of construction, the project is expected to utilize temporary light fixtures as a standard measure of nighttime construction site safety. These fixtures are typically installed on posts and/or on the sides of temporary construction trailers to illuminate stored equipment and building materials. These sources of light are generally downward-oriented, and some are only activated by motion. The temporary construction perimeter fencing (with wind fabric) is expected to visually screen the temporary light fixtures, therefore preventing temporary light spillage effects. The temporary nature of proposed lighting will allow for adjustments to ensure that illumination is properly distributed without affecting adjoining areas.

For security purposes, the project will provide nighttime lighting to safely illuminate the parking areas, entrances, signs, and walkways. According to the photometric plan, project light fixtures will consist of downward-oriented post-mounted and wall-mounted fixtures located throughout the project. The wall-mounted fixtures will provide lighting for building entryways, sidewalks, and general exterior lighting. The post-mounted fixtures are proposed to be located in the parking lot areas and along the paved driveways. The downward-oriented fixtures are designed to not only provide light on the project site, but also to reduce the amount of light emitted towards adjacent properties. The light fixtures proposed at the project site will comply with the City of Palm Springs Municipal Code, which requires that lights to illuminate private property be arranged to reflect away from adjoining property or any public way. The primary access points (at the southwestern, northeastern, and southeastern property corners) will include light fixtures to illuminate the project's gated entry points. This is typical of industrial properties.

Lighting is required to consist of full cutoff luminaries shielded or constructed so that all of the light rays emitted by the fixture are projected below the lowest point on the fixture in compliance with the lighting requirements in Section 93.21.00 of the City of Palm Springs Municipal Code.

In order to determine the impact of the proposed light fixtures at the project site, a project-specific photometric plan was generated by Commercial Lighting Industries (**Appendix B**). Per the photometric plan, the project will emit a maximum of 3.8 foot-candles at the eastern building frontage along Indian Canyon Drive. The maximum foot-candles along the northern, western, southern, and eastern property boundaries are discussed below.

Per the photometric plan, the light fixtures along the northern property boundary will emit a maximum of 2.1 foot-candles. Along Indian Canyon Drive and 19th Avenue, the project will contribute a maximum of 2.9 foot-candles and 2.2 foot-candles, respectively, per the photometric plan. Finally, light fixtures situated along the western project boundary will emit a maximum of 2.8 foot-candles. The maximum foot-candles emitted from the light fixtures occur in areas closest to the fixtures. The foot-candles decrease as the distance from the fixed light source increases. At the property boundary, the foot-candles are decreased to less than 1 foot-candle. The table below shows the maximum light emitted from the light sources along the northern, eastern, southern, and western property lines, the maximum foot-candles observed from the project boundary line, and the maximum foot-candle observed from the adjacent parcels. As displayed in the table, the project light fixtures would emit less than 0.5 foot-candles onto the adjacent properties.

Table 4.1-2 Proposed Light Fixtures Maximum Foot-Candles

Side	Max. Foot-Candle at Light Source (FC)	Max. Foot-Candle at Project Boundary (FC)	Max. Foot-Candle at Adjacent Property (FC)
North	7.3 FC	2.1 FC	0.3 FC
East	8 FC	2.9 FC	0.0 FC
South	8.0 FC	2.2 FC	0.0 FC
West	7.1 FC	2.8 FC	0.5 FC

Section 93.21.00(B)(1) of the Municipal Code establishes the following lighting standards for parking lots and area LED lighting:

- Minimum footcandles shall be 1.0 foot-candle.
- Average maintained light level of 1.0 footcandles to 2.0 foot-candles.
- Average-to-minimum uniformity ratio shall not exceed four to one (4:1).
- Maximum to Minimum uniformity ration shall not exceed sixteen to one (16:1).

According to the project photometric plan, the average light varies from 0.04 Fc (light trespass) to 4.72 Fc (east lot). See the table below. Additionally, the project complies with the 4:1 average-to-minimum uniformity ratio and 16:1 maximum to minimum uniformity ratio. The project will not result in excessive light spillage on surrounding properties, as the light fixtures will include shielding

features. The project is compliant with the Municipal Code, and would have less than significant light impacts.

Table 4.1-3 Maintained Horizontal Illuminance Calculations at Finished Grade

Location	CalcType	Units	Avg	Max	Min	Avg/Min	Max/Min
East Lot	Illuminance	Fc	4.72	7.6	2.1	2.25	3.62
Light Trespass	Illuminance	Fc	0.04	0.5	0.0	N.A.	N.A.
North Drive Aisle	Illuminance	Fc	1.86	6.4	1.0	1.86	6.40
North Large Lot	Illuminance	Fc	3.14	7.1	1.3	2.42	5.46
North Small Lot	Illuminance	Fc	3.65	7.3	1.3	2.81	5.62
South Drive Aisle	Illuminance	Fc	1.93	7.8	1.0	1.93	7.80
South Large Lot	Illuminance	Fc	3.14	7.0	1.0	3.14	7.00
South Small Lot	Illuminance	Fc	4.01	8.0	1.6	2.51	5.00
Vehicular Entry	Illuminance	Fc	3.24	6.0	1.7	1.91	3.53
West Vehicular Drive	Illuminance	Fc	2.35	5.4	1.2	1.96	4.50

Source: Photometric Plan, Commercial Lighting Industries, 2023.

Building materials such as painted concrete, white metal trim, stone accents, and anodized aluminum storefront windows are proposed to be utilized for the project exterior. The concrete will be painted in neutral colors including beiges, light and dark browns, and dark/olive green accents. The building color will conform to a range of lighter tones to reduce heat gain and be compatible with the desert landscape, therefore, avoiding unnatural and bright building facades and preventing daytime glare. The proposed structure is expected to have natural and light finishes combined with earth-tones that do not have highly reflective properties or other conditions that would cause substantial daytime or nighttime glare (see **Exhibits 4.1-12** and **4.1-13**). Glare from project structures would be less than significant.

4.1.5 Cumulative Impacts

Cumulative impacts are those resulting from past, present, and reasonably foreseeable future actions, combined with the potential visual impacts of this project. Visual resources in Palm Springs at buildout of the General Plan were considered to determine the extent to which the project would impact the resources, consistent the CEQA Guideline 15130(b)(1)(B) approach of using a summary of planned growth projections in an adopted plan. General Plan and zoning policies and standards relating to aesthetic resources and lighting were also analyzed.

As determined in this analysis of project impacts to aesthetic resources, the project would not result in significant impacts to the existing views of scenic resources. Additionally, the project proposes industrial uses that are typical in this area of the City. Furthermore, the existing context of the surrounding area includes industrial and commercial properties east and south of the project.

Other projects planned and permitted by the General Plan, would result in similar outcome compared to the project, since they would be required to comply with height limitations included in the

Municipal Code and the policies and programs of the General Plan. Future development in the City would be required to abide by the standards of the Municipal Code. Review of these projects for consistency with goals, policies and programs established in the General Plan will occur as projects are proposed. As is the case with the project, cumulative projects will preserve the views of the mid-range slopes and peaks of the surrounding mountains through height limits and design features. As a City-wide visual resource, the cumulative impacts associated with obstructed views of the surrounding mountain ranges are expected to increase over time, but will remain less than significant with buildout of the General Plan, as the overall view of the mountain ranges which surround it will remain visible throughout the City.

Build out of the cumulative projects are expected to have less than significant impacts on visual character due to the impositions of these regulations.

Cumulative impacts associated with light and glare will result from further development of vacant land as the City continues to build out. The same standards requiring limited lighting and directional and screened lighting included in the Municipal Code will be applied to future projects. The implementation of these standards and requirements is designed to minimize the impacts of light and glare on adjacent properties and throughout the City. Therefore, although lighting levels will increase as development occurs in the City, the cumulative impacts of light and glare are expected to be less than significant at General Plan build out.

4.1.6 Mitigation Measures

No significant impacts related aesthetics are identified, and therefore mitigation measures are not required.

4.1.7 Level of Significance after Mitigation

The proposed project would result in less than significant impacts to aesthetic resources, and no mitigation is required.

4.1.8 Resources

1. State Scenic Highways, Caltrans, website https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways.
2. Streets and Highways Code – SHC; Division 1. State Highways, Chapter 2. The State Highway System, Article 2.5 State Scenic Highways, California Legislative Information, https://leginfo.legislature.ca.gov/faces/codes_displayText.xhtml?lawCode=SHC&division=1.&title=&part=&chapter=2.&article=2.5.,
3. Google Maps, Map data 2022, https://www.google.com/maps

4.2 Air Quality

4.2.1 Introduction

The purpose of this section is to discuss the existing air quality setting in the Coachella Valley and analyze the potential impacts resulting from implementation of the proposed project. The air quality principles, descriptions and supporting analysis rely on the relevant background research and information made available in various public regulatory and reference documents cited throughout this section.

Reference documents include pertinent sections of the Federal *Clean Air Act* (CAA); *Final 2022 Air Quality Management Plan* (AQMP), by South Coast Air Quality Management District (SCAQMD), adopted by SCAQMD on December 2, 2022 and approved by the California Air Resources Board (CARB) Board of Directors on January 26, 2023; *Final 2016 Air Quality Management Plan* (AQMP), by SCAQMD, March 2017; *Final 2003 Coachella Valley PM10 State Implementation Plan* (CVSIP), by SCAQMD, August 2003; *Analysis of the Coachella Valley PM10 Redesignation Request and Maintenance Plan*, by the CARB, February 2010; *Draft Coachella Valley Extreme Plan for 1997 8-Hour Ozone Standard*, by SCAQMD, September 2020; *Coachella Valley Extreme Area Plan for 1997 8-Hour Ozone Standard*, Public Consultation Meeting Presentation by SCAQMD, September 2020; *Coachella Valley Extreme Area Plan for the 1997 8-Hour Ozone Standard Fact Sheet, by SCAQMD,* September 2020; and the SCAQMD Rule Book.

At the project-specific level, the analytical and quantitative findings are based on the results of the project-specific *N. Indian Canyon/19th Ave High-Cube Warehouse Air Quality Impact Analysis* (AQIA), dated December 15, 2023, the purpose of which is to evaluate the potential impacts to air quality associated with construction and operation of the proposed project. This assessment also refers to the *N. Indian Canyon/19th Ave High-Cube Warehouse Mobile Source Health Risk Assessment* (HRA), prepared on April 4, 2023, to evaluate the potential health risk impacts to sensitive receptors (residents) and adjacent workers from potential exposure of Toxic Air Contaminants (TACs), including diesel particulate matter (DPM), associated with the project.

The AQIA relied on the most current version of the California Emissions Estimator Model™ (CalEEMod) Version 2022, which serves as an adopted platform to quantify construction emissions and operational emissions from land development projects. The software is designed to calculate criteria pollutants and greenhouse gas emissions using widely accepted methodologies from project-specific and accepted default data inputs. Sources of these methodologies and default data include, but are not limited to, the United States Environmental Protection Agency (USEPA) AP-42 emission factors, CARB vehicle emission models, studies commissioned by California agencies such as the California Energy Commission (CEC) and CalRecycle.

The *N. Indian Canyon/19th Ave High-Cube Warehouse Mobile Source Health Risk Assessment (HRA)*, dated April 4, 2023, was prepared to evaluate the potential health risk impacts to sensitive receptors (which are residents) and adjacent workers associated with the development of the project, more specifically, health risk impacts as a result of exposure to Toxic Air Contaminants (TACs) including diesel particulate matter (DPM) as a result of heavy-duty diesel trucks accessing the site. The HRA was prepared in accordance with the Health Risk Assessment Guidance for Analyzing Cancer Risk from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis, and comprises all relevant and appropriate procedures presented by the United States Environmental Protection Agency (U.S. EPA), California EPA and SCAQMD. Cancer risk is expressed in terms of expected incremental incidence per million population. The SCAQMD has established an incidence rate of ten (10) persons per million as the maximum acceptable incremental cancer risk due to TAC exposure from a project such as the proposed project. This threshold serves to determine whether or not a given project has a potentially significant development-specific and cumulatively considerable impact.

The AQIA documentation referenced in this section is provided in the Appendices of this Draft EIR (**Appendix C.1**).

4.2.2 Existing Conditions

Regional Air Basin Conditions

The project site and the Coachella Valley are located within the Riverside County portion of the Salton Sea Air Basin (SSAB), under jurisdiction of the SCAQMD. The SSAB is a northwest to southeast region extending from the San Gorgonio Pass to the Mexican border. SCAQMD literature describes the Coachella Valley as having a continental, desert-type climate, with hot summers, mild winters, and very little annual rainfall. Precipitation occurs mostly in the winter months from active frontal systems, and in the late summer months from thunderstorms. Temperatures exceed 100 degrees Fahrenheit, on average, for four months each year, with daily highs near 110 degrees Fahrenheit during July and August. Summer nights are very mild with minimum temperatures in the mid-70's. During the winter season, daytime highs are quite mild, but the dry air is conducive to nocturnal radiational cooling, with early morning lows around 40 degrees.

The Coachella Valley is exposed to frequent gusty winds. The strongest and most persistent winds typically occur immediately to the east of Banning Pass, which is noted as a wind power generation resource area. Wind conditions in the remainder of the valley are geographically distinct. Stronger winds tend to occur in the open mid-portion of the valley, while lighter winds tend to occur closer to the foothills. Less frequently, widespread gusty winds occur over all areas of the valley.

The alluvial floodplain of the Whitewater River extending between Windy Point and Indian Avenue, together with the alluvial floodplain extending along the base of the Indio Hills constitute the primary blowsand source areas. Sands supplied by floodwaters to the westerly and northerly portions of the

region are transported by strong, essentially unidirectional winds to the southerly portion of the region. Transporting winds emanate from the San Gorgonio Pass and occur most frequently and with the greatest intensity during the spring and early summer months.

Blowsand is a form of larger particulate matter that can contribute to the production of the smaller PM10 (Particulate Matter with a diameter of 10 micrometers or smaller) particles in two ways: (1) by direct particle erosion and fragmentation as natural PM10, and (2) by secondary effects, as sand deposits on road surfaces. SCAQMD has defined a Coachella Valley Blowsand Zone as the corridor of land extending two miles on either side of the Interstate 10 (I-10) Freeway, beginning at the SR-111/I-10 junction and continuing southeast to the I-10/ Jefferson Street interchange in Indio. Being situated less than a half-mile north of the Interstate 10 Freeway, the project location is within the Coachella Valley Blowsand Zone that is exposed to relatively seasonal wind conditions and natural sand transport capable of producing fugitive dust from undeveloped and unstable ground conditions.

Local Physical Conditions

Based on the United States Department of Agriculture (USDA), Natural Resources Conservation Service Web Soil Survey, the project site is underlain by three soil units: Carsitas fine sand (CkB), Carsitas gravelly sand (CdC), and Carsitas cobbly sand (ChC). All three soils are composed of well drained sands or gravelly sands.

The site is exposed to cycles of particle erosion and fragmentation combined with the secondary effects of sand deposits from off-site areas to the west and northwest. The site and its general undeveloped surroundings do not exhibit substantial sand dune formations or other conditions indicative of substantial sand deposition and accumulation.

4.2.3 Regulatory Setting

Federal

Clean Air Act

The Federal Clean Air Act of 1970 (CAA) was enacted to protects and improve the nation's air quality, and has been amended numerous times since. The CAA establishes federal air quality standards (National Ambient Air Quality Standards (NAAQS)) for criteria air pollutants: O_3 (ozone), CO (Carbon Monoxide), NOx (Nitrogen Oxide), SO_2 (Sulfur Dioxide), PM_{10} (Particulate Matter 10 microns in diameter or less), $PM_{2.5}$ (Particulate Matter 2.5 microns in diameter or less), and lead, and specifies dates for achieving compliance. The CAA also mandates the preparation, approval, and enactment of State Implementation Plans (SIPs) for local areas not meeting these standards. SIPs must include pollution control measures that demonstrate how the standards will be met. The 1990 amendments to the CAA that identify specific emission reduction goals for areas not meeting the NAAQS require a demonstration

of reasonable further progress toward attainment and incorporate additional sanctions for failure to attain or to meet interim milestones. The sections of the CAA most relevant to the proposed development include Title I (Non-Attainment Provisions) and Title II (Mobile Source Provisions). Title I provisions were established with the goal of attaining the NAAQS for the following criteria pollutants: O_3, NO_2, SO_2, PM_{10}, CO, $PM_{2.5}$, and Pb. The NAAQS were amended in July 1997 to include an additional standard for O_3 and to adopt a NAAQS for $PM_{2.5}$. Mobile source emissions from cars and trucks are regulated in accordance with Title II provisions that require the use of cleaner burning fuels. Automobile manufacturers are also required to reduce tailpipe emissions of hydrocarbons and NOx, which is a collective term that includes all forms of nitrogen oxides emitted as byproducts of the combustion process.

State

California Clean Air Act

The California Clean Air Act (CCAA) mandates health-based air quality standards at the State level and delineated responsibilities and authority of the CARB and Air Quality Management Districts (AQMDs). CARB is a state level agency primarily responsible for adopting motor vehicle emission standards, compiling the SIP for submission to the U.S. EPA; approving district air quality plans as sufficient to meet State legal requirements, and providing general oversight of districts. CARB establishes State air quality regulations addressing certain categories of consumer products and mobile sources such as heavy-duty trucks, light-duty cars, construction equipment and small off-road engines. CARB has also established State ambient air quality standards for criteria pollutants which are generally more stringent than the NAAQS. The CCAA established a number of legal mandates to facilitate achieving health-based state air quality standards at the earliest practicable date. The CCAA requires that South Coast AQMD assess its progress toward attainment of the State Ambient Air Quality Standards and that this assessment be incorporated into South Coast AQMD's triennial plan revision. CARB is responsible for enforcing State standards, which are achieved through State Implementation Plans (SIP), such as the Coachella Valley PM_{10} SIP currently in effect.

Regional

South Coast Air Quality Management District

SCAQMD is the regulatory agency responsible for improving air quality for large areas of Los Angeles, Orange, Riverside and San Bernardino counties, including the Coachella Valley. Within SCAQMD jurisdiction, about 25% of this area's ozone-forming air pollution comes from stationary sources, both businesses and residences and 75% comes from mobile sources, mainly cars, trucks and buses, but also construction equipment, ships, trains and airplanes. Emission standards for mobile sources are

established by the CARB and the USEPA. The SCAQMD regional Air Quality Management Plan serves as the blueprint to bring this area into compliance with federal and state clean air standards.

The Coachella Valley is subject to the provisions of the SCAQMD Rule Book, which sets forth policies and other measures designed to meet federal and state ambient air quality standards. These rules, along with SCAQMD's 2022 AQMP, are intended to satisfy the planning requirements of both the federal and State Clean Air Acts. Applicable rules implemented by SCAQMD in the City and for the project are described below. The SCAQMD also monitors daily pollutant levels and meteorological conditions throughout the jurisdiction that includes the Coachella Valley.

Southern California Association of Governments 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy (2020-2045 RTP/SCS)

Southern California Association of Governments (SCAG) is the federally designated Metropolitan Planning Organization (MPO) for the region, including the City and project site. SCAG is responsible for developing long-range transportation plans and sustainable communities strategies for the region in accordance with federal and state law and planning requirements, including but not limited to federal Clean Air Act ambient air quality standards and ambient air quality and greenhouse gas emissions reductions standards and targets. The Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS is updated and adopted every four years. The current 2020-2045 RTP/SCS (also known as Connect SoCal 2020) was CARB certified to meet the applicable 2035 greenhouse gas (GHG) emissions reduction target for automobiles and light trucks.

Air Quality Standards and Health Effects

Existing air quality is measured at established SCAQMD air quality monitoring stations (AMS). Monitored air quality is evaluated in the context of ambient air quality standards. These standards are the levels of air quality that are considered safe, with an adequate margin of safety, to protect public health and welfare. SCAQMD operates 35 permanent air monitoring stations (AMS) within its jurisdiction. The project property and Coachella Valley region are located within the Source Receptor Area (SRA) 30, which includes three AMS locations. The Palm Springs AMS is located approximately 4 miles south of the project site and provides pertinent data relating to the project site and its surroundings.

Regional air quality is considered to be in attainment by the state if the measured ambient air pollutant levels for O_3, CO, SO_2 (1 and 24 hour), NO_2, PM_{10}, and $PM_{2.5}$ are not exceeded. All others are not to be equaled or exceeded. Attainment status for a pollutant means that the SCAQMD meets the standards set by the Environmental Protection Agency (EPA) or the California EPA (CalEPA). Conversely, nonattainment means that an area has monitored air quality that does not meet the NAAQS or California Ambient Air Quality Standards (CAAQS) standards

The following air pollutants are collectively known as criteria air pollutants and are defined as pollutants for which established air quality standards have been adopted by federal and State governments:

Carbon Monoxide (CO) is a colorless, odorless gas produced by the incomplete combustion of carbon-containing fuels, such as gasoline or wood. The highest ambient CO concentrations are generally found near congested transportation corridors and intersections. CO is emitted by automobiles, trucks, heavy construction equipment, farming equipment, and a variety of residential, commercial, and industrial energy users. The SSAB is in attainment for CO. In terms of health effects, individuals with a deficient blood supply to the heart are the most susceptible to the adverse effects of CO exposure. The effects observed include earlier onset of chest pain with exercise, and electrocardiograph changes indicative of decreased oxygen (O_2) supply to the heart.

Sulfur Dioxide (SO_2) is a colorless, extremely irritating gas or liquid. It enters the atmosphere as a pollutant mainly as a result of burning high sulfur-content fuel oils and coal, and from chemical processes occurring at chemical plants and refineries. When SO_2 oxidizes in the atmosphere, it forms SO_4. Collectively, these pollutants are referred to as sulfur oxides (SOX). For sensitive receptors, a few minutes of exposure to low levels of SO_2 can result in airway constriction. The SSAB is in attainment for SO_2.

Nitrogen Oxides (NOx) include Nitric oxide (NO) and Nitrogen dioxide (NO_2), which are the primary oxides of nitrogen, and are collectively referred to as NOx. These oxides are produced at high temperatures during combustion as byproducts of motor vehicles, power plants, and off-road equipment. NOx contributes to the formation of ozone. Short-term exposure of NO_2 can result in airway constriction and diminished lung capacity. Populations living near roadways are more likely to experience the effects of nitrogen oxides due to elevated exposure to motor vehicle exhaust. In terms of health effects, population-based studies suggest that an increase in acute respiratory illness, including infections and respiratory symptoms in children (not infants), is associated with long-term exposure to NO_2 at levels found in homes with gas stoves, which are higher than ambient levels found in Southern California.

Ozone (O_3) is a highly reactive and unstable gas that is formed when volatile organic compounds (VOCs) and NO_X, both primarily byproducts of internal combustion engine exhaust, undergo slow photochemical reactions in the presence of sunlight. O_3 concentrations are generally highest during the summer months when direct sunlight, light wind, and warm temperature conditions are favorable to the formation of this pollutant. The SSAB is in non-attainment for the federal 8-hour O_3 standard. In terms of health effects, individuals exercising outdoors, children, and people with preexisting asthma and chronic pulmonary lung disease, are considered to be the most susceptible sub-groups for O_3 effects. Short-term exposure (lasting for a few hours) to O_3 at levels typically observed in Southern California can result in breathing pattern changes, reduction of breathing capacity, increased susceptibility to infections, inflammation of the lung tissue, and some immunological changes. Elevated O_3 levels are associated with increased school absences.

Particulate Matter (PM_{10} and $PM_{2.5}$) consists of fine suspended particles of ten or 2.5 microns or smaller (determining the suffix) in diameter, and are the byproducts of road dust, sand, diesel soot, windstorms,

and the abrasion of tires and brakes. The elderly, children, and adults with pre-existing respiratory or cardiovascular disease are most susceptible to the effects of PM. Elevated PM_{10} and $PM_{2.5}$ levels are also associated with an increase in mortality rates, respiratory infections, occurrences and severity of asthma attacks, and hospital admissions. The SSAB is a non-attainment area for PM_{10} and is classified as attainment/unclassifiable for $PM_{2.5}$. Daily fluctuations in $PM_{2.5}$ concentration levels have also been related to hospital admissions for acute respiratory conditions in children, to school and kindergarten absences, to a decrease in respiratory lung volumes in normal children, and to increased medication use in children and adults with asthma.

Volatile Organic Compounds (VOC) are also known as Reactive Organic Gas (ROG). This class of pollutants has no state or federal ambient air quality standards and is not classified as a criteria pollutant; however, they are regulated because they are responsible for contributing to the formation of ozone. They also contribute to higher PM_{10} levels because they transform into organic aerosols when released into the atmosphere. Breathing VOCs can irritate the eyes, nose and throat, can cause difficulty breathing and nausea, and can damage the central nervous system as well as other organs. VOCs pose a health threat when people are exposed to high concentrations. Benzene, for example, is a hydrogen component of VOC emissions known to be a carcinogen. In terms of health effects, breathing VOCs can irritate the eyes, nose and throat, can cause difficulty breathing and nausea, and can damage the central nervous system as well as other organs. Some VOCs can cause cancer.

Lead (Pb) occurs in the atmosphere as particulate matter resulting from the manufacturing of batteries, paint, ink, and ammunition. Exposure to lead can result in anemia, kidney disease, gastrointestinal dysfunction, and neuromuscular and neurological disorders. Babies in utero, infants, and children are especially susceptible to health risks associated with exposure to lead because it impacts the central nervous system and causes learning disorders. The SSAB is in attainment for lead. In terms of health effects, exposure to low levels of Pb can adversely affect the development and function of the central nervous system, leading to learning disorders, distractibility, inability to follow simple commands, and lower intelligence quotient. In adults, increased Pb levels are associated with increased blood pressure. Pb poisoning can cause anemia, lethargy, seizures, and death; although it appears that there are no direct effects of Pb on the respiratory system. Pb can be stored in the bone from early age environmental exposure, and elevated blood Pb levels can occur due to breakdown of bone tissue during pregnancy, hyperthyroidism (increased secretion of hormones from the thyroid gland) and osteoporosis (breakdown of bony tissue). Fetuses and breast-fed babies can be exposed to higher levels of Pb because of previous environmental Pb exposure of their mothers.

The criteria air pollutants that are most relevant to current air quality planning and regulation in the SSAB include ozone (O_3), carbon monoxide (CO), nitrogen dioxide (NO_2), respirable particulate matter (PM_{10}), fine particulate matter ($PM_{2.5}$), sulfur dioxide (SO_2), and lead (Pb). The state and AAQS and their attainment status in the SSAB for each of the criteria pollutants are summarized in **Table 4.2-1*, Ambient***

Air Quality Standards and Attainment Status. Under federal and state standards, the SSAB is currently designated as nonattainment for O_3 and PM_{10}.

Table 4.2-1 Ambient Air Quality Standards and Attainment Status

Pollutant	Averaging Period	California		Federal	
		Standards	Attainment Status	Standards	Attainment Status
Ozone (O_3)	1-hour	0.09 ppm (180 µg/m^3)	Nonattainment	-	Nonattainment
	8-hour	0.070 ppm (137 µg/m^3)		0.070 ppm (137 µg/m^3)	
Nitrogen Dioxide (NO_2)	Annual Arithmetic mean	0.03 ppm (57 µg/m^3)	Attainment	0.053 ppm (100 µg/m^3)	Unclassified/ Attainment
	1-hour	0.18 ppm (339 µg/m^3)		0.100 ppm (188 µg/m^3)	
Carbon Monoxide (CO)	8 hours	9.0 ppm (10 mg/m^3)	Attainment	9 ppm (10 mg/m^3)	Unclassified/ Attainment
	1 hour	20 ppm (23 mg/m^3)		35 ppm (40 mg/m^3)	
Sulfur Dioxide (SO_2)	1 hour	0.25 ppm	Attainment	0.075 ppm	Attainment
	24 hour	0.04 ppm		-	
Lead (Pb)	30-day average	1.5 µg/m^3	Attainment	-	Unclassified/ Attainment
	Rolling 3-month average	-		0.15 µg/m^3	
Respirable Particulate Matter (PM10)	24 hour	50 µg/m^3	Nonattainment	150 µg/m^3	Nonattainment
	Annual arithmetic mean	20 µg/m^3		-	
Fine Particulate Matter (PM2.5)	24 hour	-	Attainment	35 µg/m^3	Unclassified/ Attainment
	Annual arithmetic mean	12 µg/m^3		12 µg/m^3	

Source: California Air Resources Board website at: https://www.arb.ca.gov/research/aaqs/aaqs2.pdf (accessed August 2020) and CARB, "Area Designations Maps/State and National," http://www.arb.ca.gov/desig/adm/adm.htm

Note: ppm = parts per million.

PM_{10}

The Coachella Valley is currently designated as a serious nonattainment area for PM_{10}. In the Coachella Valley, the man-made sources of PM_{10} are attributed to direct emissions, industrial facilities, and fugitive dust resulting from natural erosion, unpaved roads and construction operations. High-wind events contribute to suspended PM_{10}. The CAA requires those states with nonattainment areas to prepare and submit the corresponding State Implementation Plans (SIPs) to demonstrate how these areas will attain the NAAQS. The Final 2003 Coachella Valley PM_{10} State Implementation Plan (CVSIP) was approved by the U.S. EPA on December 14, 2005. It incorporated updated planning assumptions, fugitive dust source emissions estimates, mobile source emissions estimates, and attainment modeling with control strategies and commitments. Some of those measures are reflected in SCAQMD Rules 403 and 403.1, which were enacted to reduce or prevent man-made fugitive dust sources. The CVSIP established a

number of controls to demonstrate expeditious attainment of the standards. They are provided in Appendix C. On February 25, 2010, the ARB approved the 2010 Coachella Valley PM_{10} Maintenance Plan and transmitted it to the U.S. EPA for approval. With the recent data being collected at the Coachella Valley monitoring stations, consideration of high-wind exceptional events, and submittal of a PM_{10} Re-designation Request and Maintenance Plan, a re-designation to attainment status of the PM_{10} NAAQS is deemed feasible according to the 2022 AQMP. However, the region remains in non-attainment for PM_{10}.

O_3 (Ozone and Ozone Precursors)

The Coachella Valley portion of the SSAB is deemed to be in nonattainment for the state and federal 1-hour and 8-hour ozone averaging standard. The Coachella Valley is located downwind from the South Coast Air Basin (SCAB), and when high levels of ozone and ozone precursors are formed in the SCAB, they are transported to the Coachella Valley. Peak ozone concentrations tend to occur in the SCAB between 1:00 and 2:00 p.m. In areas downwind of the SCAB like Palm Springs, peak ozone concentrations occur in the late afternoon and early evening (between 5:00 and 6:00 p.m.). Similarly, when ozone precursors such as nitrogen oxides (NOx) and volatile organic compounds (VOCs) are emitted from mobile and stationary sources located in the SCAB, they are also transported to the Coachella Valley. SCAQMD has acknowledged that ozone exceedances in the Coachella Valley are primarily due to the direct transport of ozone and its precursors from the SCAB and that local sources of air pollution in the Coachella Valley have a limited impact on ozone levels compared to the transport of ozone precursors generated in SCAB. As part of the districtwide ozone reduction efforts, SCAQMD has adopted various rules to reduce ozone precursors. These include Rule 1121 (Control of Nitrogen Oxides from Residential Type Natural Gas-Fired Water Heaters), Rule 1147 (NOx Reductions from Miscellaneous Sources), Rule 1146 (Emissions of Oxides of Nitrogen from Industrial, Institutional, and Commercial Boilers, Steam Generators, and Process Heaters), and Rule 1146.2 (Emissions of Oxides of Nitrogen from Large Water Heaters and Small Boilers and Process Heaters).

2022 AQMP

The 2022 AQMP will become state and federally enforceable upon approval by CARB and the U.S. EPA, respectively. The 2022 AQMP was adopted by SCAQMD on December 2, 2022 and approved by the CARB Board of Directors on January 26, 2023. On February 22, 2023, CARB submitted the 2022 AQMP, CARB 2022 State Strategy for the State Implementation Plan, and associated staff reports to the U.S. EPA. U.S. EPA approval is pending. The 2022 AQMP builds upon and supersedes the 2016 AQMP with updated strategies toward air quality attainment, while recognizing the challenges from experiencing the worst levels of ground-level ozone (smog) and among the highest levels of fine particulate matter ($PM_{2.5}$) in the nation, despite the progress in air pollution reduction. The 2022 AQMP also recognizes the Coachella Valley's failure to meet federal ozone standards due to transport of pollution from the upwind South Coast Air Basin. The updated strategies focus on reducing emissions of nitrogen oxides (NOx) by 67 percent more than is required by adopted rules and regulations in 2037. This is to be achieved in part

through the extensive use of zero emission technologies across all stationary and mobile sources, combined with additional controls over stationary sources that currently account for approximately 20 percent of NOx emissions. The 2022 AQMP recognizes that the overwhelming majority of NOx emissions are from heavy-duty trucks, ships and other State and federally regulated mobile sources that are mostly beyond SCAQMD's control, so federal regulatory action will help toward the AQMP goals.

Sierra Club v. County of Fresno (Friant Ranch, L.P.) (2018) in Relation to SCAQMD

In 2018, the California Supreme Court issued a decision in the Sierra Club v. County of Fresno (2018) 6 Cal. 5th 502 case regarding the Friant Ranch project. As it relates to air quality, the Court found that an EIR should make a reasonable effort to inform how a project's emission numbers translate to potential adverse impacts, such as health consequences, or it must adequately explain why, given existing scientific constraints, it is not feasible to provide such analysis. The intent is to disclose a meaningful finding of the health consequences of the project's addition of air pollutants to an air basin and to explain the nature and magnitude of the potentially significant impact.

SCAQMD Rules

SCAQMD Rule 403 (Fugitive Dust), Rule 403.1 (Supplemental Fugitive Dust Control Requirements for Coachella Valley Sources), and Rule 1113 (Architectural Coatings) are applicable to the proposed project. Rule 403 requires the use of stringent Best Available Control Measures (BACMs) to minimize PM_{10} emissions during grading and construction activities. Rule 1113 requires reductions in the VOC content of coatings, with a substantial reduction in the VOC content. Additional details regarding these rules and other potentially applicable rules are provided in Appendix C.

Rule 402 (Nuisance)

This rule prohibits the discharge from any source whatsoever of such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health, or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property. This rule does not apply to odors emanating from agricultural operations necessary for the growing of crops or the raising of fowl or animals.

Rule 403 (Fugitive Dust)

This rule requires fugitive dust sources to implement BACMs for all sources and prohibits all forms of visible particulate matter from crossing any property line. This may include application of water or chemical stabilizers to disturbed soils, covering haul vehicles, restricting vehicle speeds on unpaved roads to 15 miles per hour (mph), sweeping loose dirt from paved site access roadways, cessation of construction activity when winds exceed 25 mph, and establishing a permanent ground cover on finished sites. SCAQMD Rule 403 is intended to reduce PM_{10} emissions from any transportation, handling,

construction, or storage activity that has the potential to generate fugitive dust (see also Rule 1186). This rule requires fugitive dust sources to implement best available control measures for all sources, and all forms of visible particulate matter are prohibited from crossing any property line. This rule is intended to reduce PM10 emissions from any transportation, handling, construction, or storage activity that has the potential to generate fugitive dust. PM10 suppression techniques are summarized below.

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

Rule 403.1 (Supplemental Fugitive Dust Control Requirements for Coachella Valley Sources)

This rule requires the reduction or prevention of the amount of PM_{10} emitted in the ambient air from man-made fugitive dust sources. The provisions of this rule are supplemental to Rule 403 and apply only to fugitive dust sources in the Coachella Valley. In addition, this rule requires a fugitive dust control plan for construction projects with a disturbed surface area of more than five thousand (5,000) square feet.

Under Rule 403.1, active operations within the Coachella Valley Blowsand Zone are required to stabilize new project-related bulk material within 24 hours of making the material deposit using water application, chemical stabilizer application, and/or installing wind breaks. Moreover, active operations within the Coachella Valley Blowsand Zone are required to stabilize new deposits of bulk material originating from off-site undisturbed desert areas within 72 hours. Such deposits typically consist of blowsand material landing on the site from upwind areas. The stabilization shall occur through water and/or soil binder application. The project is located within the Coachella Valley Blowsand Zone and is subject to the additional requirements noted above.

As a standard condition, construction activities involving five thousand (5,000) square feet of disturbed surface area must demonstrate compliance through an approved Fugitive Dust Control Plan per the City of Palm Springs Guidelines and Application elements, subsequently described, are modeled after Rule 403 and 403.1.

Rule 1113 (Architectural Coatings)

This rule requires manufacturers, distributors, and end users of architectural and industrial maintenance coatings to reduce VOC emissions from the use of these coatings, primarily by placing limits on the VOC content of various coating categories.

Rule 431.2 (Sulfur Content of Liquid Fuels)

This rule limits the sulfur content in diesel and other liquid fuels for the purpose of both reducing the formation of sulfur oxides and particulates during combustion and to enable the use of add-on control devices for diesel fueled internal combustion engines.

Rule 2305 (Warehouse Indirect Source Rule)

Rule 2305 was adopted by the SCAQMD Governing Board on May 7, 2021, to reduce NOX and particulate matter emissions associated with warehouses and mobile sources attracted to warehouses. This rule applies to all existing and proposed warehouses over 100,000 square feet located in the SCAQMD. Rule 2305 requires warehouse operators to track annual vehicle miles traveled associated with truck trips to and from the warehouse. These trip miles are used to calculate the warehouses WAIRE (Warehouse Actions and Investments to Reduce Emissions) Points Compliance Obligation. WAIRE Points are earned based on emission reduction measures and warehouse operators are required to submit an annual WAIRE Report which includes truck trip data and emission reduction measures. Reduction strategies listed in the WAIRE menu include acquire zero emission (ZE) or near zero emission (NZE) trucks; require ZE/NZE truck visits; require ZE yard trucks; install on-site ZE charging/fueling infrastructure; install onsite energy systems; and install filtration systems in residences, schools, and other buildings in the adjacent community. Warehouse operators that do not earn a sufficient number of WAIRE points to satisfy the WAIRE Points Compliance Obligation would be required to pay a mitigation fee. Funds from the mitigation fee will be used to incentivize the purchase of cleaner trucks and charging/fueling infrastructure in communities nearby.

SCAQMD Air Quality Analysis Guidance Handbook

In 1993, SCAQMD prepared its *CEQA Air Quality Handbook* to assist local government agencies and consultants in preparing environmental documents for projects subject to CEQA. The *CEQA Handbook* and the *Air Quality Analysis Guidance Handbook* describe the criteria that SCAQMD uses when reviewing and commenting on the adequacy of environmental documents. The *Air Quality Analysis Guidance Handbook* provides the recommended thresholds of significance in order to determine if a project will have a significant adverse environmental impact. Other important subjects covered in the *CEQA Handbook* and the *Air Quality Analysis Guidance Handbook* include methodologies for estimating project emissions and mitigation measures that can be implemented to avoid or reduce air quality impacts. The most recent SCAQMD Air Quality Significance Thresholds table was updated in March of 2023.

Health Risk Assessment (HRA)

As defined by SCAQMD, an HRA is a technical study that evaluates how toxic emissions are released from a facility and is important in understanding how emissions may disperse throughout the community and potentially impact human health on a local level. Proximity to sources of toxics is critical to determining the impact. In traffic-related studies, the additional non-cancer health risk attributable to proximity was seen within 1,000 feet and was strongest within 300 feet. California freeway studies show about a 70-percent drop-off in particulate pollution levels at 500 feet. Based on California Air Resources Board (CARB) and SCAQMD emissions and modeling analyses, an 80-percent drop-off in pollutant concentrations is expected at approximately 1,000 feet from a distribution center.

The Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis was approved by SCAQMD to include all relevant and appropriate procedures presented by the United States Environmental Protection Agency (U.S. EPA), California EPA and SCAQMD for undertaking analyses of the health risks associated with toxic air contaminants (TAC).

Cancer risk is expressed in terms of expected incremental incidence per million population. The SCAQMD has established an incidence rate of ten (10) persons per million as the maximum acceptable incremental cancer risk due to TAC exposure from a project. This threshold serves to determine whether or not a given project has a potentially significant development-specific and cumulatively considerable impact.

The AQMD has published a report on how to address cumulative impacts from air pollution: *White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution.* In this report the AQMD states:

"…the AQMD uses the same significance thresholds for project specific and cumulative impacts for all environmental topics analyzed in an Environmental Assessment or EIR. The only case where the significance thresholds for project specific and cumulative impacts differ is the Hazard Index (HI) significance threshold for toxic air contaminant (TAC) emissions. The project specific (project increment) significance threshold is HI > 1.0 while the cumulative (facility-wide) is HI > 3.0. It should be noted that the HI is only one of three TAC emission significance thresholds considered (when applicable) in a CEQA analysis. The other two are the maximum individual cancer risk (MICR) and the cancer burden, both of which use the same significance thresholds (MICR of 10 in 1 million and cancer burden of 0.5) for project specific and cumulative impacts.

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

Local

Palm Springs General Plan

The Air Quality Element of the Palm Springs General Plan (GP) includes various goals and policies designed to address air quality issues and their effect on the quality of life and public health. The Air Quality Element acknowledges that since air pollution is not constrained to the City's sources or jurisdiction, the matter is primarily addressed at the regional level by the various programs under the SCAQMD jurisdiction. The two air pollutants deemed of primary concern in the City of Palm Springs are ozone and PM_{10}, in part due to the nonattainment status for the SSAB. On the aspect of ozone, the Air Quality Element recognizes that the City's air pollution concerns are primarily attributed to the transport of those pollutants from the upwind air basins. Therefore, the City's policies are focused on participation in multijurisdictional ozone emissions reduction efforts, such as those lead by SCAQMD or CARB. On the aspect of PM_{10}, the City is a participant in the 2003 Memorandum of Understanding on adopting, implementing, and enforcing fugitive dust control in accordance with SCAMQD Rules 403 and 403.1. The following goals and policies established in the Air Quality Element are relevant to the proposed project:

Goal AQ1 - Improve regional air quality to protect the health of the community.

The policies under Goal AQ1 prioritize supporting or abiding by the regional standards and measures under SCAQMD. The representative policies regarding the two air pollutants of primary concern, ozone and PM_{10}, are as follows:

Policy AQ1.1: Work to attain ozone, nitrogen dioxide, carbon monoxide, lead, particulate matter, and sulfate standards as enforced by SCAQMD.

Policy AQ1.8: Support and implement the provisions of the Coachella Valley Dust Control Ordinance, Handbook, and Memorandum of Understanding.

Goal AQ2 - Control suspended particulate matter emissions from human activity or from erosion of soil by wind.

The policies under Goal AQ2 prioritize the control or prevention of fugitive dust emissions from construction activities and from developed uses. The representative policies are as follows:

Policy AQ2.1: Require those projects meeting specialized criteria as identified in the Zoning Ordinance to submit a Fugitive Dust Control Plan prior to the issuance of grading or building permits.

Policy AQ2.2: Encourage the use of landscaping, vegetation, and other natural materials to trap particulate matter or control other pollutants. Establish windbreaks immediately downwind of large open spaces. Tree species used for windbreaks should be drought tolerant.

Policy AQ2.6: Prohibit the transport of earth/soil through the City when wind gusts exceed 25 miles per hour per the City's PM10 Ordinance.

Policy AQ2.7: Require the planting of vegetative ground covers as soon as possible on construction sites.

Goal AQ3 - Protect people and land uses that are sensitive to air contaminants from sources of air pollution to the greatest extent possible.

The representative policies involving land use compatibility are as follows:

Policy AQ3.1: Discourage the development of land uses and the application of land use practices that contribute significantly to the degradation of air quality.

Policy AQ3.2: Carefully consider the placement of sensitive land uses (schools, residences, daycare, medical uses, etc.) in proximity to sources of air contaminants that pose significant health risks.

Goal AQ4 - Reduce vehicular emissions.

The policies under Goal AQ4 are more apt to coordination and implementation at the City level. The representative items are as follows:

Policy AQ4.4: Encourage walking or bicycling for short-distance trips through the creation of pedestrian-friendly sidewalks and street crossings and efficient and safe bikeways.

Policy AQ4.5: Integrate land use and transportation planning to the greatest extent possible.

City of Palm Springs Fugitive Dust Control Ordinance

Chapter 8.50 (Fugitive Dust Control) of the Palm Springs Municipal Code has been enacted to establish the minimum requirements for construction and demolition activities and other specified sources in order to reduce man-made fugitive dust and the corresponding PM_{10} emissions. The corresponding performance standards are based upon the methodologies included in the Coachella Valley Dust Control Handbook, prepared in accordance with SCAQMD Rules 403 and 403.1.

Under the City's dust control regulations, a Fugitive Dust Control Plan (FDCP) must be prepared and approved prior to any grading, earth-moving, demolition, or building operation with a disturbed surface area of more than five thousand (5,000) square feet. Consistent with SCAQMD Rules 403 and 403.1, implementation of the Fugitive Dust Control Plan is required to occur under the supervision of an individual with training on Dust Control in the Coachella Valley. The plan will include methods to prevent sediment track-out onto public roads, prevent visible dust emissions from exceeding a 20-percent opacity, and prevent visible dust emissions from extending more than 100 feet (vertically or horizontally from the origin of a source) or crossing any property line. The most widely used measures include perimeter screening, proper maintenance/cleaning of construction equipment, soil stabilization,

installation of track-out prevention devices, and wind fencing. Consistent with Rule 403.1, project operations occurring in the Coachella Valley Blowsand Zone are subject to additional requirements calling for prompt stabilization of project-related bulk materials through watering or application of soil binders and the management of material, such as sand, that may be deposited on the site from off-site undeveloped areas.

4.2.4 Project Impact Analysis

Thresholds of Significance

The following thresholds or criteria are derived from Appendix G of the CEQA Guidelines and are used to determine the level of potential effect. The significance determination is based on the recommended criteria set forth in Section 15064 of the CEQA Guidelines. For analysis purposes, buildout of the Palm Springs Fulfillment Center project would have a significant effect on air quality emissions if it is determined that the project will:

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?

Methodology

The air quality findings are based primarily on the *N. Indian Canyon/19th Ave High-Cube Warehouse Air Quality Impact Analysis* (AQIA), dated December 15, 2023. The AQIA evaluated the potential impacts to air quality associated with construction and operation of the proposed project utilizing the CalEEMod Version 2022, as the current and prescribed software method for quantifying emissions at the time of the initial AQIA preparation and NOP publication.

The project parameters serving as the basis for air emissions calculations involved a high-cube warehouse of approximately 739,360 square feet, assumed to be developed by the year 2025. The factors and reasoning for calculating construction and operational emissions are summarized below and fully described in Appendix C:

Construction Emission Factors:

The AQIA utilized a conservative construction duration from January of 2024 through April of 2025 for activities ranging from initial site preparation to the finishing stages involved with final completion. Since the project includes one building, the entire development was treated as a single phase with the corresponding stages of site preparation, grading, building construction, paving, and architectural

coating. The approximate construction duration factors, measured in business days with 8 hours of operation, involved 20 days of site preparation, 75 days of grading, 287 days of building construction, 30 days of paving, and 55 days of architectural coating. No deviation from the model's standard assumptions for the region was made. Per the preliminary grading plan, the AQIA analysis assumed balanced earthwork conditions for the grading stage.

The AQIA utilized construction trip assumptions based on CalEEMod default values with a conservative adjustment (increase) for vendor trips proportional to the project scale.

The AQIA assumptions for construction equipment use included rubber-tired dozers, crawler tractors, excavators, graders, scrapers, cranes, forklifts, generator sets, tractors/loaders/backhoes, welders, pavers, paving equipment, rollers, and air compressors at various quantities based on the stage of construction and operating total of eight (8) hours per day.

Operational Factors:

The AQIA factored operational activities associated with the project that include area, energy, mobile, and on-site cargo handling equipment source emissions. The AQIA and related technical studies assume that the project would operate 24 hours, 7 days per week.

Area source emissions involving the application of architectural coatings were based directly on the default CalEEMod factors, which are proportional to the building type and size.

Consumer products are also area source emissions that include, but are not limited to detergents, cleaning compounds, polishes, personal care products, and lawn and garden products. The emissions associated with use of consumer products were calculated based on defaults provided within CalEEMod.

The use of landscape maintenance equipment would generate area source emissions from the consumption of fuel and evaporation of unburned fuel. For purposes of analysis, the emissions associated with landscape maintenance equipment were calculated based on assumptions provided in CalEEMod.

Electricity and natural gas are used by almost every project. Criteria pollutant emissions are emitted through the generation of electricity and consumption of natural gas. However, because electrical generating facilities for the project area are located either outside the region (state) or offset through the use of pollution credits (RECLAIM) for generation within the region, criteria pollutant emissions from offsite generation of electricity are generally excluded from the evaluation of significance. The project does not propose utilizing natural gas, apart from the use of exterior cargo handling equipment. Therefore, the project will not need to connect to the existing natural gas infrastructure. The air emissions modeling in CalEEMod include the use of exterior cargo handling equipment, involving up to four (4) 200-horsepower (hp), natural gas-powered cargo handling equipment – port tractors operating 4 hours a day for 365 days of the year.

Trip characteristics available from the *N Indian Canyon/19th Ave High-Cube Warehouse Traffic Analysis* were utilized in this analysis to estimate mobile emissions associated with vehicle trips, including employee trips to and from the site, and truck trips associated with the proposed uses. Based on such study, the project is expected to generate approximately 1,574 total trips per day, which include 1,294 passenger car trips per day and 280 truck trips per day. To determine emissions from passenger car vehicles, the CalEEMod defaults were utilized for trip length and trip purpose for the proposed industrial land uses. Vehicle mix is described in the AQIA, **Appendix C.1**.

To determine emissions from trucks for the proposed industrial uses, the analysis incorporated the SCAQMD recommended truck trip length of 15.3 miles for 2-axle (LHDT1, LHDT2) trucks, 14.2 miles 3-axle (MHDT) trucks and 40 miles for 4+-axle (HHDT) trucks and weighting the average trip lengths using traffic trip percentages taken from the N Indian Canyon/19th Ave High-Cube Warehouse Traffic Analysis.

Vehicles traveling on paved roads would be a source of fugitive emissions due to the generation of road dust inclusive of brake and tire wear particulates. The emissions estimate for travel on paved roads were calculated using CalEEMod default parameters.

It is common for industrial buildings to require the operation of exterior cargo handling equipment in the building's truck court areas. For this project, on-site modeled operational equipment includes up to four (4) 200 horsepower (hp), natural gas-powered cargo handling equipment – port tractors operating at 4 hours a day for 365 days of the year. The project will not need to connect to the existing natural gas infrastructure.

The AQIA utilized the EPA-approved summer, winter, and annual Emissions Factors Model (EMFAC)2021 in order to derive vehicle emissions associated with project operational activities, which vary by season. EMFAC2021 is an approved mathematical model that was developed to calculate emission rates, fuel consumption, VMT from motor vehicles that operate on highways, freeways, and local roads in California and is commonly used by the CARB to project changes in future emissions from on-road mobile sources.

SCAQMD's CEQA Air Quality Significance Thresholds

The SCAQMD has developed regional significance thresholds for regulated pollutants, as summarized at **Table 4.2-2**. The SCAQMD's CEQA Air Quality Significance Thresholds (March 2023) indicate that any projects in the SSAB with daily emissions that exceed any of the indicated thresholds should be considered as having an individually and cumulatively significant air quality impact.

Table 4.2-2 SCAQMD Air Quality Significance Thresholds (Pounds/Day)

Emission Source	CO	VOC	NO_x	SO_x	PM_{10}	$PM_{2.5}$	Pb
Construction	550	75	100	150	150	55	3
Operation	550	55	55	150	150	55	3

Source: SCAQMD Air Quality Significance Thresholds, March 2023

Localized Significance Thresholds

The analysis makes use of methodology included in the SCAQMD Final Localized Significance Threshold Methodology (LST Methodology). The SCAQMD has established that impacts to air quality are significant if there is a potential to contribute or cause localized exceedances of the NAAQS and CAAQS. Collectively, these are referred to as LSTs.

LSTs were developed in response to environmental justice and health concerns regarding exposure of individuals to criteria pollutants in local communities. To address the issue of localized significance, the SCAQMD adopted LSTs that show whether a project would cause or contribute to localized air quality impacts and thereby cause or contribute to potential localized adverse health effects.

The project's construction emissions were summarized and compared against the applicable LST Thresholds while taking into account the project size and proximity to the nearest receptor. Details regarding the LST assumptions are provided in Appendix C.

Based on SCAQMD's *LST Methodology*, emissions for concern during construction activities are on-site NO_X, CO, $PM_{2.5}$, and PM_{10}. The *LST Methodology* clearly states that "off-site mobile emissions from the project should not be included in the emissions compared to LSTs". As such, for purposes of the construction LST analysis, only emissions included in the CalEEMod "on-site" emissions outputs were considered.

Localized air quality impacts were evaluated at receptor land uses nearest the project site. All distances were measured from the project site boundary to the outdoor living areas (e.g., backyards) or at the building façade, whichever is closer to the project site. The five locations included an existing residence at 10769 N. Indian Canyon Drive, approximately 3,327 feet north of the project site; an existing residence at 64088 Teagarden Drive, approximately 2,795 feet northeast of the project site; an existing residence at 17725 Covey Street, approximately 2,054 feet northeast of the project site, which is the closest to the project and was used as the basis for analysis; an existing residence at 17364 N. Indian Canyon Drive, approximately 3,028 feet northeast of the project site; and the Sun Valley Storage at 19125 N. Indian Canyon Drive, approximately 81 feet south of the project site, which is the closest commercial structure to the project site, and was used for analysis of impacts to exposure during an 8 hour period.

The SCAQMD's screening look-up tables were utilized in determining impacts. Consistent with SCAQMD guidance, the thresholds were calculated by interpolating the threshold values for the project's disturbed acreage.

Operational -Source Localized Emissions

The project is located on an approximately 38-acre (gross) parcel. For projects that exceed 5 acres, the 5-acre LST look-up tables can be used as a screening tool to determine whether pollutants require additional detailed analysis for operational activities. Further detail is provided in Appendix C.

Construction and Operational Health Risk Assessment

The N. Indian Canyon/19th Ave High-Cube Warehouse Mobile Source Health Risk Assessment (HRA), dated April 4, 2023, was prepared to evaluate the potential health risk impacts to sensitive receptors and workers associated with the project, as a result of exposure to TACs including diesel particulate matter (DPM) as a result of heavy-duty diesel trucks accessing the site.

The emissions calculations for the construction HRA component are based on an assumed mix of construction equipment and hauling activity. Construction related DPM emissions are expected to occur primarily as a function of the operation of heavy-duty construction equipment for 339 total working-days of construction activity.

Operational on-site and off-site truck activity DPM emissions were calculated using emission factors for particulate matter less than 10µm in diameter (PM10) generated with the 2021 version of the EMission FACtor model (EMFAC) developed by the CARB. EMFAC 2021 is a mathematical model that CARB developed to calculate emission rates from motor vehicles that operate on highways, freeways, and local roads in California and is commonly used by the ARB to project changes in future emissions from on-road mobile sources. The vehicle DPM exhaust emissions were calculated for idling and running exhaust emissions. The model incorporates regional motor vehicle data, information and estimates regarding the distribution of vehicle miles traveled (VMT) by speed, and number of starts per day. The analysis accounted for idling (on-site loading/unloading and truck gate), on-site vehicle movement (driving and maneuvering) within the development, and off-site vehicle movement. The model assumes that Light-Heavy-Duty Trucks would comprise 59.8% diesel, Medium-Heavy-Duty Trucks would be 91.6% diesel, and Heavy-Heavy-Duty Trucks would be 95.1% diesel. A complete description of the analysis methodology is provided in Appendix C.

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SENSITIVE RECEPTORS
PALM SPRINGS FULFILLMENT CENTER
EXHIBIT 4.2-1

CO Concentrations

An adverse CO concentration, known as a "hot spot", would occur if an exceedance of the state one-hour standard of 20 ppm or the eight-hour standard of 9 ppm were to occur. Currently, the allowable CO emissions standard in California is a maximum of 3.4 grams/mile for passenger cars (there are requirements for certain vehicles that are more stringent).

The AQIA provided a CO "Hot Spot" Analysis. Detailed modeling of project-specific CO "hot spots" is not needed to reach this conclusion of potential impact. An adverse CO concentration, known as a "hot spot", would occur if an exceedance of the state one-hour standard of 20 ppm or the eight-hour standard of 9 ppm were to occur.

Project Impacts

a. Conflict with or obstruct implementation of the applicable air quality plan?

The project site is located within the SSAB and is subject to SCAQMD's 2022 AQMP and the 2003 CV PM_{10} SIP. The SCAQMD is principally responsible for air pollution control, and works directly with the Southern California Association of Governments (SCAG), county transportation commissions, local governments, as well as state and federal agencies to reduce emissions from stationary, mobile, and indirect sources to meet state and federal ambient air quality standards.

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

SCAG adopted the 2020-2045 RTP/SCS to help the region meet the federal metropolitan planning organization (MPO) requirements under the Sustainable Communities and Climate Protection Act. The proposed project would be developed in accordance with all applicable rules and regulations contained in that plan.

A significant air quality impact could occur if the 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. The construction and operational PM10 emissions from the project will not exceed the applicable SCAQMD CEQA Air Quality Significance Thresholds. The project also will not exceed the construction and operational threshold for PM10 within the LST methodology and measures. Project

construction will implement a fugitive dust control plan with the additional criteria for being located within the designated Coachella Valley Blowsand Zone. Therefore, the project is not expected to conflict with the applicable regulations and mitigation measures set forth in the 2003 CV PM_{10} SIP or the AQMP.

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

Consistency Criterion 1: *The proposed project will not result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations or delay the timely attainment of air quality standards or the interim emissions reductions specified in the AQMP.*

The analysis and findings of construction and operational emission impacts are based in part on the project's numeric emission results compared against the applicable thresholds summarized in various subsequent tables: **Table 4.2-3: *Overall Construction Emissions Summary*, Table 4.2-4: *Summary of Peak Operational Emissions*, Table 4.2-5: *Localized Construction-Source Emissions – without Mitigation*, Table 4.2-7: *Localized Significance Summary of Operations – without Mitigation***. These tables were prepared to illustrate and measure whether the project would result in an air quality violation under SCAQMD.

Analysis of Construction Impacts: The violations that Consistency Criterion No. 1 refers to are the CAAQS and NAAQS. CAAQS and NAAQS violations would occur if the project caused regional or localized significance thresholds to be exceeded. The project emissions would not exceed or cause the exceedance of the applicable regional significance thresholds or LST thresholds, as demonstrated in **Tables 4.2-3** and **4.2-5**, respectively. Therefore, construction emission associated with the project will not conflict with either the AQMP or the CV PM_{10} SIP and a less than significant impact is expected.

Analysis of Operational Impacts: CAAQS and NAAQS violations would occur if regional or localized significance thresholds were exceeded. As summarized in **Tables 4.2-3** and **4.2.7**, the project emissions would not exceed the applicable regional and localized significance thresholds for operational activity, would not have the potential to result in a significant impact with respect to this criterion and the project would be consistent with the AQMP.

On the basis of the preceding discussion, the Project is determined to be consistent with Criterion 1.

Consistency Criterion 2: *The project will not exceed the assumptions in the AQMP based on the years of Project build-out phase.*

The 2022 AQMP identifies enforceable control strategies which demonstrate that the applicable ambient air quality standards can be achieved within the timeframes required under federal law. The 2022 AQMP relies on the most recent 2020-2045 RTP/SCS, which was adopted by the Southern California Association of Governments (SCAG) in September of 2020. Growth projections from local general plans adopted by cities in the district are provided to SCAG, which develops regional growth forecasts, which are then used

to develop future air quality forecasts for the AQMP. Development consistent with the growth projections in City of Palm Springs General Plan is considered to be consistent with the AQMP.

Analysis of Construction Impacts: Development of the site to its maximum potential would likely occur, with disturbance of the entire site occurring during construction activities. The project construction emissions would not exceed the applicable regional significance thresholds or LST thresholds, as demonstrated in **Tables 4.2-3** and **4.2-5**. As such, when considering that no emissions thresholds will be exceeded, a less than significant impact would result.

Analysis of Operational Impacts: The City of Palm Springs General Plan designates the project site for "Industrial" uses. The "Industrial" designation allows for research and development parks, light manufacturing, laboratories, and industrial services with a maximum FAR of 0.5 (32).

The zoning designation for the project site is designated as "Manufacturing (M-2)." The "M-2" designation allows for the development of warehouse and distribution centers, and industrial uses which include fabrication, manufacturing, assembly, or processing.

The project is proposed to consist of a high-cube warehouse of approximately 739,360 square feet, which is consistent with the site's land use and zoning designation. Since the project's proposed land use is consistent with the General Plan and as the project's construction and operational-source air pollutant emissions would not exceed the regional or localized significance thresholds, as summarized in **Tables 4.2-3** and **4.2.7**, the project is determined to be consistent with the second criterion.

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

The project would not result in or cause NAAQS or CAAQS violations. Additionally, the proposed land uses are consistent with the City's designated uses. The project is therefore considered to be consistent with the AQMP. Less than significant impacts are anticipated related to a conflict with or implementation obstruction 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?

Construction Emissions

Construction activities associated with the project will result in emissions of VOCs, NOX, SOX, CO, PM10, and PM2.5 from various stages of construction activities, including site preparation, grading, building construction, paving, and architectural coating.

Construction emissions were calculated as described in Methodology above. Based on these assumptions, emissions resulting from the project construction will not exceed criteria pollutant

thresholds established by the SCAQMD for emissions of any criteria pollutant, as shown in **Table 4.2-3**. Impacts associated with construction will be less than significant.

Table 4.2-3 Overall Construction Emissions Summary

Year	Emissions (lbs/day)					
	VOC	**NO_X**	**CO**	**SO_X**	**PM_{10}**	**$PM_{2.5}$**
Summer (Smog Season)						
2024	8.08	64.50	94.60	0.14	10.50	4.64
2025	73.90	36.30	78.10	0.09	7.20	2.66
Winter						
2024	3.97	35.30	48.20	0.07	5.95	2.78
2025	73.40	36.70	62.20	0.09	7.20	2.66
Maximum Daily Emissions	**73.90**	**64.50**	**94.60**	**0.14**	**10.50**	**4.64**
SCAQMD Regional Threshold	75	100	550	150	150	55
Threshold Exceeded?	**NO**	**NO**	**NO**	**NO**	**NO**	**NO**

Operational Emissions

Operational emissions were calculated as described in Methodology above for operations occurring 24 hours a day, 7 days a week. Operational activities for summer and winter scenarios are presented in **Table 4.2-4**. Project operational activities would not exceed the thresholds of significance established by the SCAQMD for emissions of any criteria pollutant. As such, operational impacts would be less than significant.

Table 4.2-4 Summary of Peak Operational Emissions

Source	Emissions (lbs/day)					
	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Summer (Smog Season)						
Mobile Source	6.97	35.10	134.00	0.54	14.30	3.24
Area Source	22.20	0.27	32.20	< 0.005	0.04	0.06
Energy Source	0.21	3.79	3.18	0.02	0.29	0.29
On-Site Equipment Source	0.35	1.13	49.33	0.00	0.09	0.08
Total Maximum Daily Emissions	**29.73**	**40.29**	**218.71**	**0.56**	**14.72**	**3.67**
SCAQMD Regional Threshold	55	55	550	150	150	55
Threshold Exceeded?	**NO**	**NO**	**NO**	**NO**	**NO**	**NO**
Winter						
Mobile Source	5.99	38.00	85.00	0.51	14.30	3.24
Area Source	16.90	0.00	0.00	0.00	0.00	0.00
Energy Source	0.21	3.79	3.18	0.02	0.29	0.29
On-Site Equipment Source	0.35	1.13	49.33	0.00	0.09	0.08
Total Maximum Daily Emissions	**23.45**	**42.92**	**137.51**	**0.53**	**14.68**	**3.61**
SCAQMD Regional Threshold	55	55	550	150	150	55
Threshold Exceeded?	**NO**	**NO**	**NO**	**NO**	**NO**	**NO**

Cumulative Impacts

The CAAQS designate the air basin, including the project site, as being in nonattainment for O_3, PM_{10}, and $PM_{2.5}$ while the NAAQS designates the project site as being in nonattainment for O_3 and $PM_{2.5}$.

The SCAQMD has published the *White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution* which addresses the cumulative impacts from air pollution, as described above.

Health risk assessment findings are provided in subsection (c). As it relates to criteria pollutants, because the project does not generate operational or construction emissions that exceed the SCAQMD's recommended daily thresholds for project-specific impacts, it would not cause a cumulatively considerable increase in emissions for those pollutants for which the Basin is in nonattainment, and, therefore, would not be considered to have a significant, adverse cumulative air quality impact.

c. Expose sensitive receptors to substantial pollutant concentrations

Construction-Source Localized Emissions

Table 4.2-5 identifies the localized emissions at the nearest receptor location in the vicinity of the project based on the LST criteria described in the Methodology section. Localized construction emissions would not exceed the applicable SCAQMD LSTs for emissions of any criterial pollutant. As shown in the Table, emissions associated with site preparation and grading activities are considered for purposes of LSTs since these phases represent the maximum localized emissions that would occur. Any other construction phases that overlap would result in less emissions and consequently lesser impacts.

Table 4.2-5 Localized Construction-Source Emissions – without Mitigation

Construction Activity	Year	Emissions (lbs/day)			
		NO_X	CO	PM_{10}	$PM_{2.5}$
Site Preparation	**Maximum Daily Emissions**	**23.20**	**20.70**	**4.71**	**2.73**
	SCAQMD Localized Threshold	191	1,299	279	147
	Threshold Exceeded?	**NO**	**NO**	**NO**	**NO**
Grading	**Maximum Daily Emissions**	**34.30**	**30.20**	**4.12**	**2.31**
	SCAQMD Localized Threshold	266	1,961	297	160
	Threshold Exceeded?	**NO**	**NO**	**NO**	**NO**

Operation-Source Localized Emissions

The LST analysis generally includes on-site sources (area, energy, mobile, and on-site cargo handling equipment) as described in Methodology above. The emissions shown on **Table 4.2-6** represent all on-site project-related stationary (area) sources and mobile sources. The longest on-site distance is roughly 0.35 miles for both trucks and passenger cars. A separate CalEEMod run for operational LSTs was prepared for the 0.35-mile on-site travel distance. As shown in **Table 4.2-7**, emissions resulting from the project operation will not exceed the localized thresholds of significance established by the SCAQMD for any criteria pollutant. Thus, a less than significant impact would occur for localized project-related operational-source emissions.

Table 4.2-6 Maximum Daily Localized Operational Emissions Thresholds

Operational Localized Thresholds			
NO_X	CO	PM_{10}	$PM_{2.5}$
304 lbs/day	2,292 lbs/day	74 lbs/day	40 lbs/day

Source: Localized Thresholds presented in this table are based on the SCAQMD Final LST Methodology, July 2008

Table 4.2-7 Localized Significance Summary of Operations – without Mitigation

On-Site Emissions	Emissions (lbs/day)			
	NO_X	CO	PM_{10}	$PM_{2.5}$
Maximum Daily Emissions	**27.73**	**58.26**	**0.60**	**0.47**
SCAQMD Localized Threshold	304	2,292	74	40
Threshold Exceeded?	**NO**	**NO**	**NO**	**NO**

The project would also not result in potentially adverse CO concentrations or "hot spots." The ambient 8-hour CO concentration within the project study area is estimated at 0.8 ppm—0.5 ppm. Therefore, even if the traffic volumes for the project were double or even triple of the traffic volumes generated at the referenced study intersection described in Methodology above, coupled with the on-going improvements in ambient air quality, the project would not be capable of resulting in a CO "hot spot" at any study area intersections.

Health Risk Assessment

Construction Impacts:

The land use with the greatest potential exposure to project construction-source DPM emissions is a residence at 17725 Covey Street, approximately 2,054 feet northeast of the Project site with a private outdoor living area (backyard) facing the project site. This home would experience the highest concentrations of DPM during project construction due to meteorological conditions at the site. At this location, as shown in **Table 4.2-8**, the maximum incremental cancer risk attributable to project construction-source DPM emissions is estimated at 0.09 in one million, which is less than the SCAQMD's significance threshold of 10 in one million. The Table also shows that non-cancer risks at this location were estimated to be <0.01, which would not exceed the applicable threshold of 1.0. Because all other modeled receptors would experience lower concentrations of DPM during project construction, all other receptors in the vicinity of the project would be exposed to lower emissions and therefore less risk than the home on Covey Street. The project will have less than significant impacts related to human health or cancer risk .

Table 4.2-8 Summary of construction Cancer and Non-Cancer Risks

Time Period	Location	Maximum Lifetime Cancer Risk (Risk per Million)	Significance Threshold (Risk per Million)	Exceeds Significance Threshold
1.29 Year Exposure	Maximum Exposed Sensitive Receptor	0.09	10	NO
Time Period	**Location**	**Maximum Hazard Index**	**Significance Threshold**	**Exceeds Significance Threshold**
Annual Average	Maximum Exposed Sensitive Receptor	≤0.01	1.0	NO

Operational Impacts:

In order to adequately analyze the health risks associated with the project over the long term, the HRA considered exposure resulting from operation of the project for three types of receptors: residents in the area, workers near the project, and school children. SCAQMD guidance does not require assessment of the potential health risk to on-site workers. Excerpts from the document OEHHA Air Toxics Hot Spots Program Risk Assessment Guidelines—The Air Toxics Hot Spots Program Guidance Manual for

Preparation of Health Risk Assessments (OEHHA 2003), also indicate that it is not necessary to examine the health effects to on-site workers unless required by RCRA (Resource Conservation and Recovery Act) / CERCLA (Comprehensive Environmental Response, Compensation, and Liability Act) or the worker resides on-site.

Residential Exposure:

The residential land use with the greatest potential exposure to project operational-source DPM emissions is a home approximately 3,028 feet northeast of the project site at 17364 N. Indian Canyon Drive. Since there are no private outdoor living areas facing the project site, the analysis for this location was conducted for the building façade nearest the project site. This location is distinguished from the land use with the greatest potential exposure to project construction-source DPM emissions because it does not include a private outdoor living area facing the project site, while the land use deemed most exposed to construction-source emissions includes a private living area (backyard) facing the project site. At this location, as shown in **Exhibit 4.2-1**, the maximum incremental cancer risk attributable to project operational-source DPM emissions is estimated at 0.08 in one million, which is less than the SCAQMD's significance threshold of 10 in one million. At this same location, non-cancer risks were estimated to be <0.01, which would not exceed the applicable significance threshold of 1.0. Because all other residences are located at a greater distance, they would experience lower concentrations of DPM during project operation, and would be exposed to lower emissions and less risk than the home on Indian Canyon Drive. The project will not cause a significant human health or cancer risk to residents in the area as a result of project operational activity.

Worker Exposure:

The worker receptor land use with the greatest potential exposure to project operational -source DPM emissions are workers at an existing business approximately 81 feet south of the project site. At this location, as shown in Exhibit 4.2-1, the maximum incremental cancer risk impact is 0.09 in one million which is less than the SCAQMD's threshold of 10 in one million. Maximum non-cancer risks at this same location were estimated to be <0.01, which would not exceed the applicable significance threshold of 1.0. Because all other workers in the area are located at a greater distance than this business, and DPM dissipates with distance from the source, all other worker receptors in the vicinity of the project would be exposed to lower emissions and therefore less risk. As such, the project will not cause a significant human health or cancer risk impact to workers in the area.

Table 4.2-9 Summary of Operational Cancer and Non-Cancer Risks

Time Period	Location	Maximum Lifetime Cancer Risk (Risk per Million)	Significance Threshold (Risk per Million)	Exceeds Significance Threshold
30 Year Exposure	Maximum Exposed Residential Receptor	0.08	10	NO
25 Year Exposure	Maximum Exposed Worker Receptor	0.09	10	NO
Time Period	**Location**	**Maximum Hazard Index**	**Significance Threshold**	**Exceeds Significance Threshold**
Annual Average	Maximum Exposed Residential Receptor	≤0.01	1.0	NO
Annual Average	Maximum Exposed Worker Receptor	≤0.01	1.0	NO

School Child Exposure:

A one-quarter mile radius, or 1,320 feet, is commonly utilized for identifying sensitive receptors, such as schools, that may be impacted by a proposed project. As described above, the exposure, and resultant impact of TACs decreases substantially with distance, and a one-quarter mile radius for schools exceeds the recommended 1,000-foot distance, providing a conservative analysis.

There are no schools within ¼ mile of the project site. The nearest school is Vista Del Monte Elementary School, which is located approximately 3.75 miles (19,980 feet) southeast of the project site. Because there is no reasonable potential that TAC emissions would cause significant health impacts at distances of more than ¼ mile from the air pollution source, there would be no significant impacts that would occur to any schools in the vicinity of the project.

Project DPM-Source Cancer and Non-Cancer Risks from Construction and Operational Impacts:

An existing residence at 17725 Covey Street, located approximately 2,054 feet northeast of the project site, serves as the land use with the greatest potential exposure to construction-source and operational-source DPM emissions from the proposed project. This residence includes a private outdoor living area (backyard) facing the project site. The maximum incremental cancer risk attributable to construction-source and operational-source DPM emissions from the proposed project to this location were estimated at 0.13 in one million, which is less than the threshold of 10 in one million. At this same location, non-cancer risks were estimated to be <0.01, which would not exceed the applicable threshold of 1.0. As such, the project will not cause a significant human health or cancer risk to the nearest indicated residence. Since the exposure, and resultant impact of DPM decreases substantially with distance, all other potential residential receptors would experience lower concentrations of DPM during project construction and operation and therefore would incur a lower risk than what is identified for this location.

Table 4.2-10 Summary of Construction and Operational Cancer and non-cancer risks

Time Period	Location	Maximum Lifetime Cancer Risk (Risk per Million)	Significance Threshold (Risk per Million)	Exceeds Significance Threshold
30 Year Exposure	Maximum Exposed Sensitive Receptor	0.13	10	NO
Time Period	**Location**	**Maximum Hazard Index**	**Significance Threshold**	**Exceeds Significance Threshold**
Annual Average	Maximum Exposed Sensitive Receptor	≤0.01	1.0	NO

Health Risks Related to Criteria Air Pollutant Categories

Carbon Monoxide: The project's construction and operational air pollutant emissions, both regional and localized, will not exceed the respective SCAQMD thresholds for CO. The thresholds have been designed to prevent the harmful effects of air pollution on human health, such as reduced oxygen intake and vulnerability of people experiencing heart disease. The numeric findings are provided on **Tables 4.2-3** through **4.2-7**. The project will emit CO from various sources and stages, including heavy construction equipment, automobiles, and trucks, that will contribute to the ambient CO levels. Health effects of CO are of greater concern in indoor environments, while high levels of outdoor CO concentrations are less common and are typically identified as a CO "hot spot" in adverse concentrations. The AQIA has found that the project will not result in a CO "hot spot". Therefore, the project is not expected to have the identifiable localized or regional health risks or effects from CO emissions.

Sulfur Oxides: The project's construction and operational air pollutant emissions will not exceed the respective SCAQMD regional thresholds for sulfur oxides. The thresholds have been designed to prevent the harmful effects of air pollution on human health, such as impacts to the respiratory system. The numeric findings are provided on **Tables 4.2-3** through **4.2-7**. The project will emit sulfur oxides primarily from vehicular emissions, that will contribute to the ambient sulfur oxides levels. EPA and state emissions standards for fuel and vehicles exist to protect against exposure to this air pollutant. Since the project emissions will occur below the established thresholds, the project is not expected to have the identifiable health risks or effect from sulfur oxides emissions.

Nitrogen Oxides (NOx): The project's construction and operational air pollutant emissions, both regional and localized, will not exceed the respective SCAQMD thresholds for nitrogen oxides, which is also considered an ozone precursor. The thresholds have been designed to prevent the harmful effects of air pollution on human health, such as impacts to the respiratory system. The numeric findings are provided on **Tables 4.2-3** through **4.2-7**. The project will emit nitrogen oxides primarily from vehicular emissions, that will contribute to the ambient nitrogen oxides levels. EPA and state emissions standards for fuel and vehicles have protected against exposure to nitrogen oxides. Since the project emissions will occur below

the established thresholds, the project is not expected to have the identifiable health risks or effects from nitrogen oxides emissions.

Volatile Organic Compounds and Reactive Organic Gases: The project's construction and operational air pollutant emissions will not exceed the respective SCAQMD regional thresholds for volatile organic compounds or reactive organic gases, which is also considered an ozone precursor. The thresholds have been designed to prevent the harmful effects of air pollution on human health, such as irritation, respiratory difficulties, damage to the central nervous system as well as other organs, and carcinogenic effects. The numeric findings are provided on **Tables 4.2-3** through **4.2-7**. The project will emit volatile organic compounds primarily from vehicular emissions, that will contribute to the ambient volatile organic compound levels. EPA and state emissions standards for fuel and vehicles have protected against exposure to volatile organic compounds. Since the project emissions will occur below the established thresholds, the project is not expected to have the identifiable health risks or effects from volatile organic compounds emissions.

Ozone: The project's construction and operational air pollutant emissions will not exceed the respective SCAQMD regional thresholds for ozone precursors, including nitrogen oxides and volatile organic compounds/reactive organic gases. The thresholds have been designed to prevent the harmful effects of air pollution on human health, such as respiratory difficulties, increased susceptibility to infections, inflammation of the lung tissue, and some immunological changes. The numeric findings are provided on **Tables 4.2-3** through **4.2-7**. The project will emit ozone precursors primarily from vehicular emissions, that will contribute to the ambient ozone precursors levels. EPA and state emissions standards for fuel and vehicles have protected against exposure to ozone precursors. Although the SSAB region is deemed to be in nonattainment for the state and federal 1-hour and 8-hour ozone averaging standard, SCAQMD has acknowledged that ozone exceedances in the Coachella Valley are primarily due to the direct transport of ozone and its precursors from the SCAB and that local sources of air pollution in the Coachella Valley have a limited impact on ozone levels compared to the transport of ozone precursors generated in SCAB. Since the project emissions will occur below the established thresholds, the project is not expected to have the identifiable health risks or effects from ozone precursors emissions.

Particulate Matter (PM_{10} and $PM_{2.5}$): The project's construction and operational air pollutant emissions, both regional and localized, will not exceed the respective SCAQMD thresholds for particulate matter. The thresholds have been designed to prevent the harmful effects of air pollution on human health, such as respiratory difficulties and different forms of irrigation. The numeric findings are provided on **Tables 4.2-3** through **4.2-7**. The project will emit particulate matter primarily during construction activities and to a lesser extent during operations. Since the Coachella Valley is deemed to be in nonattainment for PM10, the project's construction activities must comply with the regional requirement to prepare and exercise a fugitive dust control plan per the City of Palm Springs Guidelines and Application elements, as well as the additional requirements for the Coachella Valley Blowsand Zone aimed at controlling fugitive particulate matter emissions. Although the project-related particulate matter emissions will occur below

the established thresholds, the short-term construction activities involving earth movement and soil disturbance may contribute to the seasonal instances of impaired air quality that occur in the presence of high wind speeds. With implementation of the required dust control measures, the project is not expected to have the identifiable health risks or effects from particulate matter emissions. Regional air quality advisories and recommendations to the general population, including vulnerable groups, are issued by SCAQMD as a matter of public health.

Lead (Pb): The project's construction and operational air pollutant emissions will not exceed the respective SCAQMD regional thresholds for lead. The thresholds have been designed to prevent the harmful effects of air pollution on human health, such as those affecting children, pregnant women and older adults. The numeric findings are provided on **Tables 4.2-3** through **4.2-7**. The project will emit lead primarily from vehicular emissions. In the past, motor vehicle exhaust was the major source of lead emissions to the air. Lead has been removed from gasoline air emissions from the transportation sector, and particularly the automotive sector, resulting in a decrease in ambient levels. Since the project emissions will occur below the established thresholds, the project is not expected to have the identifiable health risks or effects from lead emissions.

The development involved in the Friant Ranch decision differed from the proposed project because its air pollutant emissions surpassed the applicable significance thresholds. Therefore, the expectation was to analyze and disclose the potential health effects related to exceeding emission levels. By comparison and as summarized throughout this section, the proposed project involves construction and operational emission levels for all criteria pollutants occurring below SCAQMD's Air Quality Significance Thresholds and therefore are found to have a less than significant impact on regional ambient air quality. Since the SCAQMD thresholds and related efforts were established to meet the health-based NAAQS and CAAQS for criteria pollutants as part of the emission reduction strategy to attain regional healthy levels of air quality, the numeric SCAQMD Air Quality Significance Thresholds would result in less than significant impacts on health effects.

Friant Ranch Case

The Brief of Amicus Curiae by the SCAQMD on the Friant Ranch case provides insight into the applicability of the Court's ruling as it pertains to the region's air district jurisdiction. The brief was prepared to discuss "the practical realities of correlating identified air quality impacts with specific health outcomes." Additional SCAQMD information has been compiled in the *Air Quality and Health Effects* paper published by the City of Los Angeles, Department of City Planning, providing subsequent information and reasoning on the feasibility of addressing the Friant Ranch Ruling for CEQA projects under the SCAQMD jurisdiction.

The SCAMQD amicus brief focused on ozone, which at the time and in the current 2022 AQMP continues to be one of the greatest challenges for the air district jurisdiction. Ozone concentrations are generally highest during the summer months when direct sunlight, light wind, and warm temperature conditions are favorable. Once formed, ozone can be transported long distances by wind. The Coachella Valley is a

region that is not known to produce significant levels of NOx or VOCs but receives the transport of ozone and its precursors from the upwind air basins.

SCAQMD has set its CEQA significance threshold for ozone precursors (NOx and VOC) at 55 lbs/day or 10 tons per year. In the capacity as the regional agency primarily responsible for air pollution control in the South Coast and Salton Sea Air Basins, SCAQMD has taken the position that a source emitting 10 tons per year or greater of NOx or VOC would contribute cumulatively to ozone formation, while levels below 10 tons per year would be considered by SCAQMD small enough that their regional impact on ambient ozone levels may not be detected in the regional air quality models that are currently used to determine ozone levels for health-related purposes. This numeric level is based on EPA and SCAQMD's definition of a single major source threshold for hazardous air pollutants under their Title V program, in accordance with the Clean Air Act.

Thus, project-related levels of NOx and VOC occurring below SCAQMD's Air Quality Significance Thresholds would not be correlated with specific health impacts from ozone. No expert agency, including the SCAQMD and CARB, has approved a quantitative method to reliably and meaningfully translate mass emission estimates of criteria pollutants to specific health effects.

In summary, federal and state ambient air quality standards have been primarily designed to prevent the harmful effects of air pollution on health. These standards are reviewed and updated based on evolving research. At the regional level, plans such as the SCAQMD's AQMP work to ensure that the local basins, including the SSAB, reach and maintain attainment with these health-based federal and state standards. However, sufficient data is unavailable to reach a clear correlation between projects, including the proposed project, which emit less than significant air pollution and their effect on human health.

Therefore, sensitive receptors would not be exposed to substantial pollutant concentrations as the result of project construction and operational activities, and impacts will be less than significant.

d. Result in other emissions (such as those leading to odors adversely affecting a substantial number of people?

Land uses generally associated with odor or other noxious emission complaints include:

- Agricultural uses (livestock and farming)
- Wastewater treatment plants
- Food processing plants
- Chemical plants
- Composting operations
- Refineries
- Landfills
- Dairies

- Fiberglass molding facilities

The project does not contain land uses typically associated with emitting objectionable odors. Potential odor sources associated with the proposed project may result from construction equipment exhaust and the application of asphalt and architectural coatings during construction activities and the temporary storage of refuse associated with the proposed project's (long-term operational) uses. Standard construction requirements would minimize odor impacts from construction. The construction odor emissions would be temporary, short-term, and intermittent in nature and would cease upon completion of the respective phase of construction. The nearest sensitive receptors are residences located at 17725 Covey Street and 17364 N. Indian Canyon Drive, approximately 2,054 feet and 3,028 feet northeast of the project site, respectively. Impacts are thus considered less than significant.

The Municipal Code requires that project-generated refuse be stored in designated trash enclosures and removed at regular intervals in compliance with the City's solid waste regulations. The proposed project would also be required to comply with SCAQMD Rule 402 to prevent occurrences of public nuisances. Therefore, odors associated with the proposed project construction and operations would be less than significant.

4.2.5 Cumulative Impacts

As previously shown in **Table 4.2-1**, the CAAQS designate the Coachella Valley as being in nonattainment for O_3 PM_{10}, and $PM_{2.5}$ while the NAAQS designates the Valley as being in nonattainment for O_3 and $PM_{2.5}$.

As described under threshold (b) above, since the project does not exceed the SCAQMD's recommended daily thresholds for project-specific impacts, it would also not cause a cumulatively considerable increase in emissions for those pollutants for which the Basin is in nonattainment, and would not be considered to have a significant, adverse cumulative air quality impact.

Moreover, as it relates to health risk, the project was found to not exceed SCAQMD's thresholds for potential carcinogenic and non-carcinogenic health effects that could result from sensitive receptor exposure to TACs generated by the proposed project, including construction-related and operational-related DPM as a result of heavy-duty diesel trucks accessing the site. Since SCAQMD's thresholds are used to determine potentially significant project-specific and cumulatively considerable impacts, the project would not be considered to have a significant, adverse cumulative health risk impact.

The proposed project will result in construction and operational emission levels for all criteria pollutants occurring below SCAQMD's Air Quality Significance Thresholds. Since the SCAQMD thresholds and related efforts were established to meet the health-based NAAQS and CAAQS for criteria pollutants as part of the emission reduction strategy to attain regional healthy levels of air quality, the project's compliance with the said thresholds would translate to less than significant regional impacts on health effects.

4.2.6 Mitigation Measures

No mitigation measures are necessary.

4.2.7 Level of Significance After Mitigation

Based on the preceding analysis, the proposed project is anticipated to have less than significant impacts.

4.2.8 Resources

1. Analysis of the Coachella Valley PM10 Redesignation Request and Maintenance Plan, by the California Air Resources Board, February 2010; and sections of the SCAQMD Rule Book
2. *Coachella Valley Extreme Area Plan for 1997 8-Hour Ozone Standard*, Public Consultation Meeting Presentation by SCAQMD, September 25, 2020
3. *Coachella Valley Extreme Area Plan for the 1997 8-Hour Ozone Standard Fact Sheet*, SCAQMD, September 2020
4. *N. Indian Canyon/19th Ave High-Cube Warehouse Air Quality Impact Analysis (AQIA)*, December 15, 2023.
5. Draft Coachella Valley Extreme Plan for 1997 8-Hour Ozone Standard, by SCAQMD, September 2020.
6. Final 2003 Coachella Valley PM10 State Implementation Plan (CVSIP), by SCAQMD, August 2003
7. Final 2016 Air Quality Management Plan (AQMP), by South Coast Air Quality Management District (SCAQMD), March 2017
8. 2022 Air Quality Management Plan (AQMP), by South Coast Air Quality Management District (SCAQMD), December 2022
9. Application of the SCAQMD for Leave to File of Amicus Curiae in Support of Neither Party and Brief of Amicus Curiae, April 6, 2015.
10. Air Quality and Health Effects, Sierra Club V. County of Fresno, City of Los Angeles Department of City Planning, October 2019

4.3 Biological Resources

4.3.1 Introduction

Descriptions and analysis in this section are based on information contained in the *General and Focused Biological Resources Assessment and CVMSHCP Consistency Analysis* prepared by James W. Cornett, Ecological Consultants (December 2022), the Environmental Initial Study (January 2023), the Coachella Valley Conservation Commission website, State of California Natural Resources Agency Department of Fish and Wildlife *Staff Report on Burrowing Owl Mitigation* (2012), *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities* (2018), and the *City of Palm Springs General Plan 2007*. This section discusses the biological resources that may be present on the project site or in the vicinity and assesses impacts on these resources from the development of the Palm Springs Fulfillment Center project ("project"). The *General and Focused Biological Resources Assessment and CVMSHCP Consistency Analysis* ("biological report"), is included in the Appendices of this Draft EIR as **Appendix D**.

An Initial Study was prepared for the NOP for this Draft EIR, and is included in **Appendix A**. Following the screening criterion related to biological resources in the Initial Study, the following threshold topics do not require additional analysis in this Draft EIR.

b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife 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?

The analysis in the biological report and initial study determined that the project has no potential to affect any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife Service because the project site and the surrounding area do not contain federally protected wetlands, marshes, or other natural drainage features. The analysis also determined that the project has no potential to affect state or federally protected wetlands through direct removal, filling, hydrological interruption, or other means due to the absence of significant wash vegetation, riparian vegetation, or other sensitive natural communities on the project site. The site consists of one plant community, the Sonoran creosote bush scrub community, which has no association with riparian habitats and contains no surface water resources. No impacts are anticipated.

Other potential effects on biological resources are assessed below.

4.3.2 Existing Conditions

Physical Conditions

The project site is located within the City of Palm Springs, in the Coachella Valley, in Riverside County. The environment of the project site is part of the desert scrub habitat of the valley floor. Off-road vehicle tracks are found throughout the project site, impacting about 5 percent of the terrain. Surrounding land uses include a light industrial park to the east of the project, a light industrial park to the south of the project, fenced vacant land to the immediate west, and undisturbed creosote scrub habitat to the north of the site. The extension of the sewer line located in 19th Avenue, approximately 650 feet from the project site will occur entirely within paved roadway right of way and will not impact biological resources.

Topography and Soils

The elevation of the project is approximately 780 feet above sea level. Soil characteristics are relatively uniform over the entire site. According to the Palm Springs General Plan, Figure 6-3, *Geologic Map,* the site's surficial sediment consists of alluvium, sand, and gravel.

Vegetation

The Sonoran creosote bush scrub community is the dominant vegetation on the project site and beyond the project site throughout the Colorado Desert of Southeastern California. The most abundant plant on the site is the creosote bush (*Larrea tridentata*) followed by burrobush (*Ambrosia dumosa*), Mojave indigo bush (*Psorothamnus arborescens*), brittlebush (*Encelia farinosa*), and Emory's Dalea (*Dalea emoryi*). Soil disturbance in and around the project site has resulted in intrusion of common weed species that germinate and grow in the Colorado Desert after damage or removal of native vegetation. On the project site, such species include Sahara mustard (*Brassica tournefortii)*, bugseed (*Dicoria canescens)* and Schismus grass (*Schismus barbatus*).

Altogether, the following plant species were identified on the site: Burrobush (*Ambrosia dumosa),* Cheese-bush (*Ambrosia salsola*), Sweet bush (*Bebbia juncea*), Fremont pincushion (*Chaenactis fremontii*), Desert Dicoria (*Dicoria canescens*), brittlebush (*Encelia farinosa*), mitra (*Stephanomeria exigua*), purple-rooted forget-me-not (*Cryptantha micrantha*), plicate coldenia (*Tiquilia plicata*), Sahara mustard (*Brassica tournefortii*), silver cholla (*Cylindropuntia echinocarpa*), California barrel cactus (*Ferocactus cylindraceus*), beaver-tail cactus (*Opuntia basilaris*), sand-mat (*Chamaesyce polycarpa*), (*Astragalus lentiginosus coachellae*), Mojave indigo bush (*Psorothamnus arborescens*), Emory dalea (*Psorothamnus emoryi*), and white ratany (*Krameria grayi*).

There is no evidence or records that any plant species considered sensitive occurs within the project site boundaries, but there are special-status plant species that may occur on the site because the site

provides suitable habitat. These are listed under "*Project Impact*," topic "a" in the section "*Special-Status Species Summary*".

Wildlife

Common wildlife species observed within the project site during the field surveys include the Becker's white butterfly (*Pontia beckerii*), sand scorpion (*Paruroctonus mesaensis*), ghost beetle (*Asbolus verrucosus*), harvester ant (*Pogonomyrmex californicus*), side-blotched lizard (*Uta stansburiana*), common raven (*Corvus corax*), mourning dove (*Zenaida macroura*), house finch (*Carpodacus mexicanus*), house sparrow (*Passer domesticus*), the long-tailed pocket mouse (*Chaetodipus formosus*), cactus mouse (*Peromyscus eremicus*), black-tailed jackrabbit (*Lepus californicus*), coyote (*Canis latrans*), and the Palm Springs ground squirrel (*Spermophilus tereticaudus chlorus*). The Palm Springs Ground Squirrel was detected within project site boundaries and is likely to occur on or near the project site. The Palm Springs Ground Squirrel is included in the California Department of Fish and Wildlife *Special Animals List* and is considered a state Species of Special Concern. The Palm Springs Ground Squirrel is further discussed in the section, "*Special-Status Species Summary".*

One special-status avian species, potentially occurring within the project boundaries, is the loggerhead shrike (*Lanius ludovicianus*). In addition, burrowing owl (*Athene cunicularia*) was identified on the project site during site surveys. These species are further discussed under "*Project Impact*," topic "a" in the section "*Special-Status Species Summary*".

Jurisdictional Waters

There are no naturally occurring springs on the project site. No blue-line stream corridors (streams or dry washes) occur in the project area.

4.3.3 Regulatory Setting

Federal, State, and local regulations pertaining to biological resources are discussed below.

Federal

Endangered Species Act

The Federal Endangered Species Act (FESA) of 1973 provides a program for the conservation and protection of endangered and threatened plants and animals and the habitats in which they are found. Section 7 of the ESA directs federal agencies to use their legal authorities to carry out conservation programs for listed species. It also requires these agencies to ensure that any actions they fund, authorize, or carry out are not likely to jeopardize the survival of any endangered or threatened species, or to destroy or adversely modify its designated critical habitat (if any).

Additional protection is authorized by Section 9 of the ESA, which makes it illegal to take, import, export, or engage in interstate or international commerce of listed animals except by permit for certain conservation purposes. “Take” is defined by the ESA as to harm, harass, wound, trap, collect, kill or the attempt to engage in such activity.

Habitat Conservation Plans

Habitat Conservation Plans (HCPs) under section 10(a)(1)(B) of the ESA provide for partnerships with non-federal parties to conserve the ecosystems upon which listed species depend, ultimately contributing to their recovery. HCPs are planning documents required as part of an application for an incidental take permit. They describe the anticipated effects of the proposed taking; how those impacts shall be minimized or mitigated; and how the HCP is to be funded. HCPs can apply to both listed and non-listed species, including those that are candidates or have been proposed for listing. Conserving species before they are in danger of extinction or are likely to become so can also provide early benefits and prevent the need for listing.

The Migratory Bird Treaty Act

The Migratory Bird Treaty Act of 1918 (MBTA) governs the obligation of the United States under international treaties and conventions for the protection of migratory birds. The MBTA governs the taking, killing, possession, transportation, and importation of migratory birds, their eggs, parts, and nests. The MBTA prohibits the take, possession, import, export, transport, selling, purchase, barter, or offering for sale of any migratory birds, their eggs, parts, and nests, except as authorized under a valid permit by the Department of Interior U.S. Fish and Wildlife Service.

Clean Water Act

The Clean Water Act (CWA) was established in 1972 as the basic structure for regulating discharges of pollutants into the waters of the United States and regulating quality standards for surface waters. Under the CWA, the EPA has implemented pollution control programs such as setting wastewater standards for industries. The EPA has also developed national water quality criteria recommendations for pollutants in surface waters.

It is unlawful under the CWA to discharge any pollutant from a point source, which is a discrete conveyance such as a pipe or man-made ditch, into navigable waters unless a permit is obtained. The National Pollutant Discharge Elimination System (NPDES) permit program controls discharges. Industrial, municipal, and other facilities must obtain permits if their discharges go directly to surface waters. Compliance monitoring under the NPDES Program encompasses a range of techniques in order to address the most significant problems and to promote compliance among the regulated community.

State

California Endangered Species Act

The California Endangered Species Act (CESA) enacted in 1970 and subsequently amended, conserves and protects plant and animal species at risk of extinction. The California Department of Fish and Wildlife (CDFW) has the responsibility for maintaining a list of threatened and endangered species (California Fish and Game Code Section 2070). CDFW also maintains a list of "candidate species," which are species formally noticed as being under review for addition to either the list of endangered species or the list of threatened species. In addition, CDFW maintains lists of "species of special concern," which serve as "watch lists." Pursuant to the requirements of the CESA, an agency reviewing a proposed project within its jurisdiction must determine whether any state-listed endangered or threatened species could be present on a project site and determine whether the proposed project could have a potentially significant impact on such species. In addition, CDFW encourages informal consultation on any proposed project that may affect a candidate species.

California Fish and Game Code

Section 3511, Birds; Section 4700, Mammals; Section 5050, Reptiles and Amphibians; and Section 5515, Fish, of the California Fish and Game Code provide that designated fully protected species may not be taken or possessed without a permit. Incidental take of these species is not authorized by law.

Pursuant to Section 3503.5 of the California Fish and Game Code, it is unlawful to take, possess, or destroy any birds of prey or to take, possess, or destroy any nest or eggs of such birds. Birds of prey refer to species in the orders Falconiformes and Strigiformes.

Nests of all other birds (except English sparrow [Passer domesticus] and European starling [Sturnus vulgaris]) are protected under Sections 3503 and 3513 of the California Fish and Game Code.

Pursuant to Section 1602 of the California Fish and Game Code, CDFW regulates all diversions, obstructions, and changes to the natural flow or bed, channel, or bank of any river, stream, or lake that supports fish or wildlife. Diversion, obstruction, or changes to the natural flow or bed, channel, or bank of any river, stream, or lake that supports fish or wildlife requires authorization from CDFW by means of entering into an agreement pursuant to Section 1602 of the California Fish and Game Code.

Native Plant Protection Act

The Native Plant Protection Act (NPPA) enacted in 1977 and implemented by the CDFW, prohibits the killing or possession of California rare, threatened, or endangered plant species without authorization or permit by CDFW. All state departments and governing agencies are required to use their authority to enforce conservation of rare or endangered plant species.

Regional and Local

Coachella Valley Multiple Species Habitat Conservation Plan

The Coachella Valley Multiple Species Habitat Conservation Plan/Natural Community Conservation Plan (CVMSHCP) is a regional multi-agency conservation plan that provides for the long-term conservation of ecological diversity in the Coachella Valley region of Riverside County.

The CVMSHCP includes an area of approximately 1.1 million acres in the Coachella Valley region. A major amendment to the Plan, completed in 2016, added 770 acres to the Plan's Conservation Areas. The plan area boundaries were established to incorporate the watersheds of the Coachella Valley within the jurisdictional boundaries of Coachella Valley Association of Governments (CVAG) and within Riverside County. Indian Reservation Lands are not included in the CVMSHCP although coordination and collaboration with tribal governments has been ongoing.

The Coachella Valley Conservation Commission (CVCC) is the agency responsible for CVMSHCP implementation. The CVCC is comprised of elected representatives of the Local Permittees including Riverside County, the cities of Cathedral City, Coachella, Desert Hot Springs, Indian Wells, Indio, La Quinta, Palm Desert, Palm Springs, and Rancho Mirage, the Coachella Valley Water District, Mission Springs Water District, and the Imperial Irrigation District. The Riverside County Flood Control and Water Conservation District (County Flood Control), Riverside County Regional Park and Open Space District (County Parks), and Riverside County Waste Resources Management District (County Waste) are also Local Permittees.

Other Permittees include three state agencies, the California Department of Parks and Recreation (State Parks), the Coachella Valley Mountains Conservancy (CVMC), and the California Department of Transportation (CalTrans). The CVMSHCP involves the establishment of an MSHCP Reserve System to ensure the conservation of the covered species and conserved natural communities in perpetuity. Existing conservation lands managed by local, state, or federal agencies, or non-profit conservation organizations form the backbone of the MSHCP Reserve System (CVMSHCP Annual Report 2019).

Palm Springs General Plan

Adopted in 2007, the City of Palm Springs General Plan Recreation, Open Space & Conservation Element provides guidance related to the protection of habitat and wildlife resources including the preservation of open space lands. The Natural Resources section of the Element describes the biological, conservation efforts in Palm Spring, and the City's goals, policies, and actions to manage these resources, reproduced below.

Goal RC7: Support the preservation and protection of biological resources, especially sensitive, rare, threatened, or endangered species, wildlife, or habitats.

Policy RC7.1: Implement the provisions of the Coachella Valley Multiple Species Habitat Conservation Plan and the Tribal Habitat Conservation Plan.

Policy RC7.2: In the event that the aforementioned habitat conservation plans are not adopted, the following actions shall be implemented:

a) Create a biological resources overlay zone and associated regulations that require proposed development projects to comply with the following practices prior to approval:

i) Provide appropriate biological studies to the City, signed by a registered biologist, that document potential impacts to habitats and wildlife from proposed projects;

ii) Comply with land use, development regulations, site planning, and construction practices that will be set forth in the City's Zoning Code; and

iii) Provide the appropriate mitigation measures and monitoring plan, in compliance with federal and state statutes, to minimize the impacts to habitat and wildlife.

4.3.4 Project Impact Analysis

Thresholds of Significance

The thresholds used to evaluate potential impacts to biological resources are derived from Appendix G of the CEQA Guidelines. The significance determination is based on the recommended criteria set forth in Section 15064.5 of the CEQA Guidelines. For analysis purposes, development of the proposed project would have a significant effect on biological resources if it is determined that the project would:

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?
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?

Methodology

Methods used for the Biological Resources Assessment (referred to as "biology report" herein), included a literature review and field surveys.

Field Surveys

General Biological Surveys

James W. Cornett Ecological Consultants conducted general field surveys within the project site on November 18, 19, 20, 27, 28, 30, December 2, 3, and 4, 2022. Night surveys were conducted on the evenings of November 18, 21, and 22.

Survey dates were in the fall when perennial plant species and resident bird and mammal species could be found. Annual plants would not be identifiable during this period.

Surveys were conducted by walking north-south transects at 10-yard intervals through the project site and one hundred yards beyond the northern site boundary. Offsite surveys could not be conducted to the south, east and west of the project site as they are developed private properties. The survey pattern and intensity are consistent with recommendations of the U.S. Fish & Wildlife Service and CDFW for determining the presence or absence of the burrowing owl and desert tortoise and determining the presence and absence of special-status plants based on the State of California Natural Resources Agency Department of Fish and Wildlife, *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities*. Animal surveys were conducted simultaneously with plant surveys. In addition, twenty live-animal traps (which capture animals unharmed) for large and small mammals were set within the project site for twenty-four-hour periods on November 21 and 22, 2022.

Literature Review

Prior to the initiation of field work, reviews of the literature and institutional records were conducted to determine the biological resources that might exist within the Coachella Valley and to determine the possible occurrence of special-status species. Records, collections, websites and/or staff of the University of California at Riverside Herbarium, the Boyd Deep Canyon Desert Research Center, the CVAG, and the Calflora website were consulted for specific information regarding the occurrence of sensitive species. The California Department of Fish & Game Natural Diversity Database was also consulted.

Project 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

Several sensitive plant species may potentially exist on the site. As per the U.S. Fish and Wildlife Service, "special-status species" encompass any species that has been officially designated as threatened or

endangered by the U.S. Fish and Wildlife Service under the regulations of the Endangered Species Act (ESA) or is in the process of being considered for such listing. Additionally, special-status species include any species protected by state statute in a manner indicating potential vulnerability or risk of extinction.

The California Department of Fish and Wildlife defines "special-status species" as species that meet at least one of the following conditions: (1) Species listed as threatened or endangered under the ESA or under consideration for possible future listing under the ESA. (2) Species listed or under consideration for listing by the State of California as threatened or endangered under the California ESA. (3) Plant species designated as rare under the California Native Plant Protection Act. (4) Species meeting the criteria of endangered, rare, or threatened species as outlined in CEQA Guidelines section 15380, subdivision (b) and (d). (5) Plants deemed locally significant due to their rarity within a specific local context, such as a county or region.

The State of California Natural Resources Agency Department of Fish and Wildlife, *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities* requires that botanical surveys be conducted in a manner that maximizes the likelihood of locating special-status plants and sensitive natural communities that may be present. The general field surveys conducted for the proposed project were completed on November 18, 19, 20, 27, 28, 30, December 2, 3, and 4, 2022, during a time when many sensitive plant species that could occur on the site could be detected.

The species and the likelihood of the species to occur onsite are discussed below:

Special-Status Species Summary

Plants

Glandular ditaxis (*Ditaxis clariana*): This species is a perennial herb that blooms from December through March. It is restricted to sandy environments in the Sonoran Desert and has been found in the Coachella Valley at elevations like those found on the project site. The project site can be considered suitable habitat for this species. The biological survey was conducted in the fall when perennial plant species are more likely to be detected if present. The glandular ditaxis is a perennial but was not detected and therefore is presumed to not occur onsite. The glandular ditaxis is not listed as rare, threatened, or endangered by either the state or federal governments nor is it proposed to be listed at this time. No additional surveys are recommended.

Ribbed cryptantha (*Johnstonella costata*): This species is an uncommon ephemeral known to occur on sandy soils in the Coachella Valley. The project site can be considered suitable habitat for this species. It was not detected; however, the surveys were conducted in November and early December when it is unlikely that this winter- and spring-blooming species would be detected. The ribbed cryptantha is not listed as rare, threatened, or endangered by either the state or federal governments nor is it proposed

to be listed at this time. Additionally, no records exist on or near the project site. For these reasons, no additional surveys are recommended.

Flat-seeded spurge (*Chamaesyce platysperma*): This species is an uncommon ephemeral herb known to occur on sandy soils in the Sonoran Desert. There has been at least one specimen found in the Coachella Valley. The species was not detected, but the surveys were done in November when many ephemerals would not be in evidence. The flat-seeded spurge is not listed as rare, threatened, or endangered by state or federal governments nor is it proposed to be listed. Additionally, there are no records of its presence on or adjacent to the project site. For these reasons, no additional surveys for this species are recommended.

Coachella Valley milk vetch (*Astragalus lentiginosus coachellae*): This species is an uncommon, spring-blooming perennial herb that is known to occur on sandy soils in the Coachella Valley. No individuals were detected on or near the project site. This subspecies has been found less than a mile from the project site in similar habitat. Seeds of this species may, therefore, occur on the project site. The milk vetch is listed as endangered by the U.S. Fish & Wildlife. The Coachella Valley milk vetch is a covered species under the CVMSHCP. Payment of the Local Development Mitigation Fee (LDMF) mitigates impact to the Coachella Valley milk vetch. Therefore, no further action is necessary.

White-bracted spineflower (*Chorizanthe xanti* var. *leucotheca*): This species is a small ephemeral found on sand or gravel plains at middle elevations primarily west of Highway 62. A handful of specimens have been found in the northwestern Coachella Valley. It was not detected during surveys but would not be in bloom and unlikely to be detected in November or early December. It is not listed by state or federal government nor is it a candidate for listing. In addition, it has never been found on, or immediately adjacent to, the project site. Therefore, no additional surveys for this species are recommended.

Slender cottonheads (*Nemacaulis denudate gracilis*): This species is a small ephemeral found primarily in the northwestern Coachella Valley. It is not known to be in bloom and in evidence in November and early December when the field surveys were conducted. The species usually occurs on sandy benches adjoining washes, a habitat not found within, or immediately adjacent to, the project site. It is not officially listed by either state or federal governments though it is considered a species of special concern by the state. It is a covered species under the CVMSHCP. No other actions are required.

Little San Bernardino Mountains Linanthus (*Linanthus maculatus*): This species is a small ephemeral found across the Sonoran Desert of California. Several individuals have been found in the Coachella Valley though all were found south of the project site. No records exist for its presence on, or immediately adjacent to the project boundaries. The subspecies is not officially listed by either the state or federal government nor is it a candidate for listing. For these reasons, no additional surveys for this species are recommended.

Arthropods

Two insect species known to occur within the Coachella Valley have been placed on the California Department of Fish and Game's *Special Animals list*. These species are the Coachella giant sand treader cricket (*Macrobaenetes valgum*) and Coachella Valley Jerusalem cricket (*Stenopelmatus cahuilaensis*). The United States Fish & Wildlife Service has listed as endangered a third insect species, Casey's June beetle, (*Dinacoma caseyi*). None of these three insect species were found during the surveys. The former two would not be found within the project boundaries because they prefer areas of windblown sand, a habitat not found in the immediate area. Casey's June beetle is a federally listed species but has never been found north of Vista Chino Road in Palm Springs. Therefore, no further action is necessary, and no impact to special-status arthropod species would occur.

Reptiles

No special-status amphibian species were found during the surveys, and none are expected.

No individuals of the officially threatened Coachella Valley fringe-toed lizard (*Uma inornate*) were observed, detected, or expected due to the absence of areas of loose, windblown sand.

No desert tortoise (*Goperhus agassizi*) was observed, and no evidence of any kind (shell fragments, scat, tracks, burrows) was found nor direct observations made. It is concluded this species does not occur within the project site and immediate vicinity at this time and no additional surveys for this species are recommended. Therefore, no impact would occur to Coachella Valley fringe-toed lizards or desert tortoise.

No flat-tailed horned lizard (*Phrynosoma mcallii)* was observed, and no evidence or sign (scat, tracks) was found. The lizard requires areas of loose windblown sand, a habitat not found within the project boundaries. California considers the flat-tailed horned lizard a Species of Special Concern. The lizard is a covered species under the CVMSHCP. Therefore, no further action is necessary, and there would be no impact to special-status reptile species.

Birds

In regard to special-status bird species, no observations or calls of LeConte's thrasher (*Toxostoma lecontei*) were recorded during the surveys. In the Coachella Valley, this resident species is strongly associated with golden cholla in which it nests. The golden cholla cacti within the project boundaries are considered too small (less than two feet in height) to provide nesting or roosting sites for the thrasher. The LeConte's thrasher is a covered species under the CVMSHCP.

Two special-status, avian species potentially occurring within the project boundaries are the loggerhead shrike (*Lanius ludovicianus*) and burrowing owl (*Athene cunicularia*).

Loggerhead Shrike (*Lanius ludovicianus)*: Shrikes nest in dense shrubs or trees that are at least three to four feet in height. No such plants exist within or immediately adjacent to the project site. The shrike is a non-covered species and considered a Species of Special Concern by the state of California. No shrikes

were observed at the project site. Due to the lack of suitable nesting sites for the shrike, no spring breeding surveys for this species are recommended. No impact on loggerhead shrikes is expected.

Burrowing Owl (*Athene cunicularia*): A burrowing owl was observed five times during the field surveys and one active burrow with one owl was found within the site boundaries. The entire site is considered suitable burrowing owl habitat with friable soil and rodent burrows that could be expanded in size by the owls. Expanded rodent burrows are used as shelter and for nesting by the owls. No active nests were found during the survey days. Due to the presence of burrowing owls on the project site, there would be a potentially significant impact if not addressed. This impact is addressed in **Mitigation Measure BIO-1**. **Mitigation Measure BIO-1** requires clearance surveys for the burrowing owl not less than 14 days prior to site disturbance and then again 24 hours prior to site disturbance. If the presence of any burrowing owl is confirmed in preconstruction surveys, regardless of season, a qualified biologist shall prepare a plan for avoidance or relocation and submit it to the CDFW for review and approval. No construction activity shall be permitted until the measures contained in the approved plan have been completed. Further details on the required burrowing owl clearance surveys are described below under "Mitigation Measures".

In order to mitigate any potential project-related impacts to migratory bird species covered under the MBTA, a pre-construction survey for nesting birds shall be required as described in Mitigation **Measure BIO-2**. This would ensure that no harm would occur to a migrating, nesting bird species if found nesting on the project site. A pre-construction survey would reduce impacts to less than significant.

Mammals

Palm Springs Ground Squirrel (*Spermophilus tereticaudus*): The Palm Springs ground squirrel is considered a state Species of Special Concern. In the past, it was considered a candidate species for listing by the United States Fish & Wildlife Service. Although the species was not detected on the project site, burrows were detected within the site boundaries and therefore the species could likely occur on or near the site. The species is covered under the CVMSHCP. **Mitigation Measure BIO-3** requires the project applicant to pay the LDMF, which will mitigate impacts to the Palm Springs Ground Squirrel to less than significant levels.

Special-Status Species Conclusion

No impact associated with the Coachella giant sand treader cricket (*Macrobaenetes valgum*), Coachella Valley Jerusalem cricket (*Stenopelmatus cahuilaensis*), Coachella Valley fringe-toed lizard (*Uma inornate*), flat-tailed horned lizard (*Phrynosoma mcallii*), or the LeConte's thrasher (*Toxostoma lecontei*) were found because appropriate habitat does not occur. Casey's June beetle, (*Dinacoma caseyi*) is a federally listed species but has never been found north of Vista Chino Road in Palm Springs; therefore, no impacts would occur to this species and the species listed, and no mitigation measures are required.

As discussed above, no sensitive or special-status plant species were found to occur on the project site during the biological surveys; however, the Coachella Valley milk vetch (*Astragalus lentiginosus*

coachellae) could occur within the project boundaries because the site is suitable habitat and has been found less than a mile from the project site in a similar habitat.

The Coachella Valley milk vetch is a covered species under the CVMSHCP. Mitigation for impacts to the species is accomplished through payment of a fee to CVAG. Fees vary depending upon the use to which the land is put, acreage and density. Payment of the fee is required in **Mitigation Measure BIO-3**, thereby reducing impacts to less than significant levels**.**

The Palm Springs Ground Squirrel could also occur on site due to burrows being detected within the site boundaries during the biological field survey. It is a covered species under the CVMSHCP. The implementation of the LDMF in **Mitigation Measure BIO-3** ensures that effects to the species are reduced to less than significant levels.

Migratory birds occurring in the project area are covered by the MBTA. Pre-construction nesting bird surveys in compliance with the MBTA would mitigate any potential project-related impacts to these species; therefore, a pre-construction survey for nesting birds is required in **Mitigation Measure BIO-2**. A pre-construction survey would reduce impacts to less than significant levels.

Finally, burrowing owls were observed within the project boundaries on five occasions. An active burrow was found with a single owl occupying it. Should the owl be disturbed, a significant impact would occur. In order to reduce the impact to less than significant levels, **Mitigation Measure BIO-1** is required. This mitigation measure requires a clearance survey be conducted not more than 14 days prior to grubbing, grading, or other surface disturbances to determine whether the species still occurs on the site. A final clearance survey must be conducted 24 hours prior to ground disturbance. If the owl is present during the breeding season (February 15 through September 15), a qualified biologist will establish a buffer area (a no disturbance zone) around the active burrow. When it is determined that all young owls have permanently left the burrow (fledged), the buffer area may be abandoned, and the adult owls captured and relocated. All these activities must be governed by a plan approved by CDFW. If an owl is present, regardless of the presence of young, a qualified biologist must develop either an avoidance or a relocation plan for review and approval by the CDFW, approved under permit. **Mitigation Measure BIO-1** would ensure that impacts to burrowing owls would be less than significant.

With the implementation of **Mitigation Measure BIO-1** through **BIO-3**, impacts to species identified as candidate, sensitive, or special-status would be reduced to less than significant levels.

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 site

The project's vacant and undeveloped condition may provide suitable habitat for wildlife species, however, the project's adjacency to the busy Indian Canyon Drive roadway and existing industrial and commercial businesses do not present ideal conditions for wildlife corridors or native wildlife nursery

sites. During the biological survey, no concentration of animal tracks was found on or near the project boundaries. Track concentrations can be an indicator of wildlife corridors, so the absence of animal tracks means it is likely that the project site is not being used as a wildlife corridor.

However, there are bushes and trees on and adjacent to the site that have the potential to harbor migratory birds. Construction of the project could adversely affect nesting birds if construction was to occur while they are present or adjacent to the project site. If construction was to occur while nesting birds were present on or adjacent to the site, it would violate the MBTA and CDFW Section 3503. Implementation of **Mitigation Measure BIO-2** would require pre-construction nesting bird survey to mitigate any potential impacts to protect migratory nesting birds.

There are no native or migratory fish on the project site because there is no water source on the site. The isolation of the site by surrounding roadways and development on three sides limits the potential for wildlife corridors. There is no evidence of any native wildlife nursery site on the property.

Therefore, through implementation of **Mitigation Measure BIO-2**, impacts would be reduced to less than significant levels.

e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance

The City has not adopted any ordinances regarding tree preservation. As observed during the field survey, the project site mainly consists Sonoran creosote bush scrub habitat. No trees are located on the project site under existing conditions. The City has no other policies or ordinances protecting biological resources, outside of its participation in the CVMSHCP (see threshold (f) below). Therefore, the project would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance, and no impact would occur.

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

The project site is located within the boundaries of CVMSHCP but is not located within any conservation areas. The project would be subject to payment of the LDMF, as described as **Mitigation Measure BIO-3**. The fee would mitigate potential impacts to covered species within the CVMSHCP. The project would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. Impacts would be less than significant.

4.3.5 Cumulative Impacts

The buildout of the City of Palm Springs pursuant to its adopted General Plan has the potential to impact biological resources by reducing native habitat areas and directly affecting fauna and flora. Continued urban growth and development in the City may be expected to result in displacement and loss of habitat for wildlife species occurring on currently undeveloped or sparsely developed lands. Where the native habitat is still present in the City, it may be impacted by increased vehicle travel, alteration of soils, vegetation removal, and habitat degradation associated with new development. When considered in combination with other cumulative development within the City, there is potential for adverse cumulative effects to biological resources. Environmental protection laws and regulations have been applied with increasing rigor since the early 1970s and include the California Endangered Species Act, Federal Endangered Species Act, and the Clean Water Act, as described in the Regulatory Setting earlier in this EIR chapter.

The proposed project within the City would be required to comply with local, State, and federal laws and policies and all applicable permitting requirements of the regulatory and oversight agencies intended to address potential impacts on biological resources. Regulations and requirements implemented by the California Department of Fish and Wildlife, U.S. Fish and Wildlife Service, and U.S. Army Corps of Engineers shall be enforced by the City. The requirements established by these agencies are designated to protect species, water bodies, and habitats from negative impacts associated with development.

Public agencies in the Coachella Valley have implemented the CVMSHCP specifically to address the potential cumulative impacts of development on biological resources. The key components of the CVMSHCP include the preservation of habitat in Conservation Areas, to assure the long-term survival of endemic and native species. The project site is located within the boundaries of CVMSHCP but is not located within any conservation areas or wildlife movement corridors or linkages. To assure that the project contributes to this long-term solution, **Mitigation Measure BIO-3** requires the payment of the mitigation fee, which is specifically allocated to the purchase and conservation of lands for covered species. All projects on vacant lands are required to pay the fee, thereby assuring that impacts to covered species are cumulatively less than significant.

In addition, the project, and all future projects, are required to adhere to the requirements of the MBTA and to protect burrowing owls if they occur on a project site. Both these requirements, presented in **Mitigation Measures BIO-1** and **BIO-2**, respectively, will be applied to future projects as development occurs in the City and region. These standards, requirements and mitigation measures are designed to reduce cumulative impacts to biological resources to less than significant levels. Cumulative impacts resulting from the project and other projects over time will therefore be less than significant.

4.3.6 Mitigation Measures

BIO-1 Per the 2012, California Department of Fish and Wildlife (CDFW) *Staff Report on Burrowing Owl Mitigation,* a burrowing owl clearance survey shall be performed by a qualified biologist 14 to 30 days prior to any site disturbance (grubbing, grading, and construction). The pre-construction survey is required to use accepted protocol (CDFW Staff Report). A final clearance survey must be conducted 24 hours prior to ground disturbance. If owls are found to be present during the breeding season (February 15 through September 15), a qualified biologist will prepare a plan and submit it to CDFW for review and approval prior to establishing a buffer area (a no disturbance zone) around the active burrow. When it is determined that all young owls have permanently left the burrow (fledged), the buffer area may be abandoned, and the adult owls captured and relocated, if approved under the plan. If the presence of any burrowing owl is confirmed in preconstruction surveys, regardless of season, a qualified biologist shall prepare a plan for avoidance or relocation and submit it to the CDFW for review and approval. No construction activity shall be permitted until the measures contained in the approved plan have been completed.

BIO-2 For any 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, 24 hours prior to initiation of project-related ground disturbing activities. If nesting birds are present, no work shall be permitted near the nest 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.

BIO-3 The project applicant will pay the Local Development Mitigation Fee (LDMF). The payment of this fee will mitigate impact to species on the project site that are covered under the CVMSHCP to a less than significant level.

4.3.7 Level of Significance after Mitigation Measure

With the implementation of **Mitigation Measure BIO-1** through **BIO-3** impacts to biological resources are reduced to less than significant levels.

4.3.8 Resources

1. Environmental Protection Agency, https://www.epa.gov/laws-regulations/summary-endangered-species-act, accessed 2023.
2. General and Focused Biological Resources Assessment, James W. Cornett Ecological Consultants, December 2022.

3. Palm Springs General Plan, 2007 *https://www.palmspringsca.gov/home/showpublisheddocument/12189/635545493507830000, accessed 2023.*
4. U.S. Fish and Wildlife Service, page 5-26, https://www.fws.gov/program/endangered-species, accessed 2023.
5. Staff Report on Burrowing Owl Mitigation, State of California Natural Resources Agency, Department of Fish and Game, March 2012.
6. Protocols for Surveying and Evaluating Impacts to Special-Status Native Plant Populations and Sensitive Natural Communities, Department of Fish and Game, March 2018

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4.4 Cultural Resources

4.4.1 Introduction

Descriptions and analysis in this section are based on information contained in the *Cultural Resources Assessment* prepared by Statistical Research, Inc. (SRI) (February 2023), and the City of Palm Springs *Recreation, Open Space & Conservation Element*. This section discusses the cultural resources that may be present in the project site or in the vicinity and assesses impacts on these resources from the implementation of the proposed project. The cultural resources report is included in the Appendices of this Draft EIR (**Appendix E,** *Cultural Report*).

4.4.2 Existing Conditions

Current Natural Setting

The project site encompasses approximately 38 acres located in the northwest corner of Indian Canyon Drive and 19th Avenue in the City of Palm Springs. The project area is vacant and undeveloped land consisting of sparse creosote scrub bush, brittlebush and various desert grasses. A series of off-highway vehicles trails cross the landscape, and as a result much of the project area exhibits some degree of surface disturbance. The project area is at an elevation of approximately 780 feet above mean sea level. The surface soil consists of sandy sediments. Offsite improvements will include connecting to the existing 12-inch sewer lines approximately 650 feet east of the project, along 19th Avenue. This area is covered by asphalt and connection will occur in the existing right of way.

Cultural Setting

Prehistoric Context

The prehistoric occupation of the Coachella Valley appears to have been correlated to the presence of Lake Cahuilla. The earliest known sites date to the Late Archaic period. Most of these sites are at or near the ancient lakeshore, as are several sites dating the late prehistoric period. Although the beginning and ending dates of different cultural horizons vary regionally, the three principal prehistoric periods are the Paleoindian, Archaic, and Late Prehistoric periods as outlined below:

- Paleoindian Period (ca. 12,500-9,000 years before present (B.P.)): Native peoples of this period, probably with Clovis technology (fluted projectile points), occupied what is now California beginning about 12,000 years ago. However, there is very little evidence of Paleoindian period occupation of the northern Coachella valley. The reasons for this are unclear but may be related to a lack of habitat for the large game hunted by Clovis people.

- Archaic Period (ca. 8000-1,500 B.P.): Very little is known about the overall Late Archaic period adaptions or social structure. There is evidence in various locations in the Coachella Valley of habitation, including hearth features, activity surfaces and a variety of artifact types, such as flaked stoned debitage; faunal remains; and possible human remains.
- Late Prehistoric Period (ca. 1500-200 B.P.): Yuman (or Patayan) agricultural groups in the Colorado River area began to influence Colorado Desert groups, particularly in the Coachella Valley. This Patayan pattern included a preceramic phase and three ceramic phases, Patayan I (ca. 1500–1000 B.P.), II (ca. 1000–500 B.P.), and III (after ca. 500 B.P.). After about 1000 B.P. (Patayan II), several cultural traits, including new ceramic types, small triangular points, and cremations, moved westward from the Colorado River, either spreading through diffusion or perhaps carried by some migrating Yuman people. Whichever the case, long-distance trade networks were established between the Coachella Valley and the Colorado River. The Late Prehistoric period groups that occupied the Coachella Valley were the direct ancestors of the ethnographic Cahuilla. This period represents a significant increase in human occupation of the valley, and several large archaeological sites from the period have been identified.

Ethnohistoric Context

The aboriginal group that occupied the northern Coachella Valley during the historical period was the Desert Cahuilla, who, along with the Mountain and Pass Cahuilla, constituted the ethnographic Cahuilla. The Cahuilla spoke the language of the Takic branch of Northern Uto-Aztecan and the Desert Cahuilla spoke a distinct dialect of Cahuilla. Villages were in areas with access to a number of resources, either at springs or where wells could be easily dug. As a result, most villages relied on hand-excavated walk-in wells for water. These wells were dug to a depth of about 20 feet, to reach the water table. Villages were loose clusters of houses spread over an area up to 0.6 miles across. Some houses were large and others were smaller; at least one large ceremonial structure was present in each village. Once established, villages were considered permanent and were occupied by lineages. Villages were connected to each other by a complex system of trails. The Cahuilla were organized into moieties, tribelets (i.e., clans), and then lineages. The lineages were landholding groups, and each occupied its own village. The adjacent lineage, with its own village, would generally belong to the other moiety. This arrangement served to ensure access to different habitats. Each village was economically independent.

The Desert Cahuilla exploited a large number of plant species, of which mesquite on the valley floor was the primary staple. Other important resources, such as agave, pinyon, and acorns, were obtained in the mountains to the west. More than 150 species of plants were used for food, fibers, medicines, manufacturing, and dyes. The Cahuilla exploited a variety of animals from mountain habitats, including deer, mountain sheep, and pronghorn, and smaller animals, such as rabbits and rodents, from desert habitats. The Desert Cahuilla also grew a few agricultural crops, namely corn, beans, and squash, which were probably obtained from native peoples along the Colorado River to the east. By the late eighteenth

century, the Cahuilla had adopted ranching as an important industry and worked as wage laborers on railroads, farms, and ranches. After the smallpox and measles epidemic of 1863, the Cahuilla population, originally perhaps as many as 3,000 people, declined rapidly. In addition, the emigration of young people seeking work in the metropolitan areas of southern California caused many Cahuilla to move away from their traditional areas. In 1974, approximately 900 people claimed Cahuilla descent, most of whom lived on one of the many Cahuilla reservations in inland southern California.

The Agua Caliente Indian Reservation was founded in 1876 by an Executive Order of President Ulysses S. Grant and was expanded in 1877 and 1907. The reservation covers roughly 31,420 acres and consists of all even-numbered sections. The odd numbered sections had already been given to railroads as an incentive to develop cross-country rail lines, and so the reservation appears as a checkerboard pattern on maps. In 1891, Congress passed the Mission Indian Relief Act, which authorized allotments of reservation land to be given to individuals. The allotment elections were finally approved by the Secretary of the Interior as part of the Equalization Act in 1959 (Public Law 86-339), which finalized the individual allotments and set aside certain lands for Tribal use and cemeteries. The Agua Caliente Band of Cahuilla Indians (ACBCI) has a land-exchange agreement with the U.S. Department of the Interior Bureau of Land Management and is actively acquiring other non-reservation land.

Historic Context

The earliest recorded European visit to the Coachella Valley was in the winter of 1823-1824 by Jose Romero, the leader of an expedition attempting to reach the Colorado River by a new route. Until the mid-nineteenth century, however, most nonnative forays into the area were confined to the established prehistoric trails systems. A number of those trails passed through the Western Coachella Valley, including the important Cocomaricopa Trail, which connected Arizona with the cultures along the southern California coast.

In 1853, William P. Blake described the Coachella Valley during the Pacific Railroad Survey expedition, recording the general environment, noting the locations of Indian villages, describing native agriculture in the valley, and recording some oral traditions of the Indians concerning life around ancient Lake Cahuilla. In 1855 and 1856, the U.S. Land Office Survey surveyed the valley and divided it into townships and sections. European settlement of the valley intensified after the completion of the Southern Pacific Railroad in 1877. In the 1880s, the Homestead Act and the Desert Land Act opened much of the public land in the area to private development. Farming was the primary economic activity in the valley, supported by a variety of wells that accessed sizable underground water resources. In 1948-1949, construction of the Coachella Canal supplied additional water to the valley. Much of the area to the east of the project area, in the area around Indio, is still an important agricultural center.

The development of the state highway system in the early twentieth century opened the valley to further development. State Route 99 (now Varner Road) was completed through the area in 1912. The Coachella Valley became a popular vacation spot for the wealthy and Hollywood stars from the Los Angeles Basin.

During the late twentieth Century, development in the Coachella Valley expanded rapidly, with scores of country clubs, resorts, hotels, and housing developments appearing along U.S. Highway 111 and Interstate-10. Native American development, with several casino resorts, golf courses, and other developments, has also driven economic expansion in the valley.

4.4.3 Regulatory Setting

Federal

National Historic Preservation Act

The National Historic Preservation Act (NHPA) (54 USC 300101 et seq.) instituted a multifaceted program, administered by the Secretary of the Interior, to encourage sound preservation policies of the nation's cultural resources at the federal, State, and local levels. The NHPA authorized the expansion and maintenance of the National Register of Historic Places (NRHP), established the position of State Historic Preservation Officer, and provided for the designation of State Review Boards. The NHPA also set up a mechanism to certify local governments to carry out the goals of the NHPA and created the Advisory Council on Historic Preservation (ACHP).

Section 106 of the NHPA (54 USC 306108) states that federal agencies with direct or indirect jurisdiction over federally funded, assisted, or licensed undertakings must take into account the effect of the undertaking on any historic property that is included in or eligible in the NRHP. After an undertaking is identified, federal agency stakeholders must consult by notifying the appropriate consulting parties. Consultation is between the federal agency, the State Historic Preservation Officer (SHPO) or Tribal Historic Preservation Officer (THPO), and other consulting parties. including but not limited to the ACHP, certified local governments, and members of the general public with an economic, social or cultural interest in the project.

National Register of Historic Places

The National Register of Historic Places (NRHP) was established by the NHPA in 1966 as "an authoritative guide to be used by federal, state, and local governments, private groups and citizens to identify the Nation's cultural resources and to indicate what properties should be considered for protection from destruction or impairment" (36 CFR part 60.2). The NRHP recognizes properties that are significant at the national, state, and local levels. To be eligible for listing in the NRHP, a resource must be significant in American history, architecture, archaeology, engineering, or culture. Districts, sites, buildings, structures, and objects of potential significance must also possess integrity of location, design, setting, materials, workmanship, feeling, and association.

A property is eligible for the NRHP if it is significant under one or more of the following criteria:

- **Criterion A:** It is associated with events that have made a significant contribution to the broad patterns of our history.
- **Criterion B:** It is associated with the lives of persons who are significant in our past.
- **Criterion C:** It embodies the distinctive characteristics of a type, period, or method of construction, or represents the work of a master, or possesses high artistic values, or represents a significant and distinguishable entity whose components may lack individual distinction.
- **Criterion D:** It has yielded, or may be likely to yield, information important to prehistory or history. Ordinarily cemeteries, birthplaces, or graves of historic figures; properties owned by religious institutions or used for religious purposes; structures that have been moved from their original locations; reconstructed historic buildings; and properties that are primarily commemorative in nature are not considered eligible for the NRHP unless they satisfy certain conditions. In general, a resource must be 50 years of age to be considered for the NRHP unless it satisfies a standard of exceptional importance.

State

California Register of Historical Resources

Created in 1992 and implemented in 1998, the California Register of Historical Resources (CRHR) is "an authoritative guide in California to be used by state and local agencies, private groups, and citizens to identify the state's historical resources and to indicate what properties are to be protected, to the extent prudent and feasible, from substantial adverse change" Public Resources Code (PRC) (Sections 21083.2 and 21084.1). Certain properties, including those listed in or formally determined eligible for listing in the NRHP and California Historical Landmarks numbered 770 and higher, are automatically included in the CRHR. Other properties recognized under the California Points of Historical Interest program, identified as significant in historical surveys, or designated by local landmark programs, may be nominated for inclusion in the CRHR. According to PRC Section 5024.1 (c), a resource, either an individual property or a contributor to a historic district, may be listed in the CRHR if the State Historical Resources Commission determines that it meets one or more of the following criteria, which are modeled on NRHP criteria:

- **Criterion 1:** It is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage.
- **Criterion 2:** It is associated with the lives of persons important in our past.
- **Criterion 3:** It 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.
- **Criterion 4:** It has yielded, or may be likely to yield, information important in history or prehistory.

California Environmental Quality Act

CEQA also requires lead agencies to determine if a project would have a significant effect on the environment, including significant effects on historical or archaeological resources. Under PRC Section 21084.1, a project that may cause a substantial adverse change to the significance of a historical resource is a project that may have a significant effect on the environment. CEQA guidelines recognize that historical resources include:

- A resource listed in, or determined to be eligible by the State Historical Resources Commission for listing in, the CRHR;
- A resource included in a local register of historical resources, as defined in PRC Section 5020.1(k), or identified as significant in a historical resource survey meeting the requirements of PRC Section 5024.1(g); and
- Any object, building, structure, site, area, place, record, or manuscript that a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California.

If a lead agency determines that an archaeological site is a historical resource, then the resource under CEQA must be protected. If a project may cause a substantial adverse change to the resource and avoidance is not feasible, the lead agency must identify potentially feasible measures to lessen the impact to less than significant levels.

If an archaeological site does not meet the historical resource criteria contained in the State CEQA Guidelines, and it is not deemed a unique archaeological resource in accordance with PRC § 21083.2 and CEQA Guidelines § 15064.5, no further action would be required.

California Health and Safety Code

The California Native American Graves Protection and Repatriation Act of 2001 is intended to provide a seamless and consistent state policy to ensure that all California Indian human remains, and cultural items be treated with dignity and respect. The intent of the legislature shall also do the following:

- Apply the state's repatriation policy consistently with the provisions of the Native American Graves Protection and Repatriation Act (25 U.S.C. Sec. 3001 et seq.), which was enacted in 1990.
- Facilitate the implementation of the provisions of the federal Native American Graves Protection and Repatriation Act with respect to publicly funded agencies and museums in California.
- Encourage voluntary disclosure and return of remains and cultural items by an agency or museum.
- Provide a mechanism whereby lineal descendants and culturally affiliated California Indian tribes that file repatriation claims for human remains and cultural items under the Native American Graves Protection and Repatriation Act (25 U.S.C. Sec. 3001 et seq.) or under this chapter with

California state agencies and museums may request assistance from the commission in ensuring that state agencies and museums are responding to those claims in a timely manner and in facilitating the resolution of disputes regarding those claims.

- Provide a mechanism whereby California tribes that are not federally recognized may file claims with agencies and museums for repatriation of human remains and cultural items.

Regional and Local

City of Palm Springs General Plan

The City of Palm Springs General Plan Recreation, Open Space & Conservation Element provides guidance for the City's natural resources, including the preservation of open space lands and the conservation of minerals, energy, water and historic and cultural resources, including local archaeology and paleontology within Palm Springs.

Goals and policies addressed in the Open Space & Conservation Element that apply to the development of the proposed project include:

Policy RC10.1: Support the preservation and protection of historically, architecturally, or archaeologically significant sites, places, districts, structures, landforms, objects, native burial sites and other features.

Policy RC10.6: Maintain active communication and cooperation with the Tribal Historic Preservation Office, the Palm Springs Historic Society and other historic preservation entities.

Policy RC10.4: Require site assessment conducted by qualified specialists whenever information indicates that a site proposed for development may contain paleontological, historic, or archaeological resources.

The City's Historic Preservation Ordinance is designed to preserve areas and specific buildings that reflect elements of its cultural, social, economic, political, architectural, and archaeological history. It also established a Historic Site Preservation Board to maintain and update the City's Historic Resources Inventory, prepare local nominations for historic registers, monitor progress in preservation and development issues, and promote community awareness and participation in historic preservation. The Agua Caliente Band of Cahuilla Indians' Tribal Historic Preservation Office has jurisdiction over historic resources on reservation lands.

Agua Caliente Band of Cahuilla Indians Tribal Historic Preservation Office

The Tribal Historic Preservation Office and/or Officer (THPO) is responsible for the management of cultural resources significant to the Tribe, such as archaeological sites, burials, trails, buildings or other structures, resource gathering areas (plants, minerals), and sacred places (springs, hills, etc.).

Designated by the National Park Service in 2005 as a THPO, pursuant to the National Historic Preservation Act, as amended, the THPO has assumed functions of the State Historic Preservation Officer in administering the National Historic Preservation Act on the reservation. The THPO works with the Tribal Council, the Tribal membership, other Tribal departments and programs, and federal and state agencies to meet its primary responsibilities, including compliance and consultation, monitoring construction and archaeological excavations, protecting burials, and maintaining an archival database.

The THPO reviews proposed development projects for their potential to impact historic properties and cultural resources important to the Tribe and/or eligible for the Tribal register, California Register of Historical Resources, or National Register of Historic Places. The THPO develops policies and consults with Coachella Valley cities, and Riverside County, on California Environmental Quality Act and other state-regulated documents. The THPO consults with federal agencies, including the National Park Service, the Bureau of Land Management, and the U.S. Forest Service to mitigate adverse impacts significant resources.

4.4.4 Project Impact Analysis

Thresholds of Significance

The thresholds used to evaluate potential impacts to cultural resources are derived from Appendix G of the CEQA Guidelines. The significance determination is based on the recommended criteria set forth in Section 15064.5 of the CEQA Guidelines. For analysis purposes, development of the proposed project would have a significant effect on cultural resources if it is determined that the project would:

a. Cause a substantial adverse change in the significance of a historical resource pursuant to 15064.5.
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to 15064.5.
c. Disturb any human remains, including those interred outside of formal cemeteries.

Methodology

Statistical Research, Inc. (“SRI”) completed a Cultural Resources Assessment Report (“Cultural Report”) which included a records search, historical background research, Sacred Lands search, contact with Native American representatives, and an intensive-level field survey of the entire project site, in order to identify cultural resources in the project area. The methods and results are provided below.

Records Search

A records search at the Eastern Information Center (EIC), University of California, Riverside, was completed on September 22, 2022. The goals of the records search were to review any previous archaeological investigations that may have been conducted within and surrounding the project area

and to identify any previously recorded archaeological resources on the property and in the vicinity. The records search also included consultation of the catalogs of sites listed in the National Register of Historic Places (NRHP) and/or designated California Historical Landmarks (CHLs).

Field Survey

The 38-acre project site as well as a 20-acre site area to the west of the project site were surveyed for a combined total of 58 acres.

A pedestrian survey was conducted on October 31, 2022. The survey was completed by walking north-south oriented transects across the project site. The progress of the survey was monitored using a Global Navigation Satellite System (GNSS) unit and high-resolution aerial photographs. During the survey, transect starting and stopping points were guided using the GNSS technology. The field crew also used the GNSS unit to record and map all identified cultural resources encountered within each transect and photographed each artifact with a digital camera. Photographs documented the artifacts within their geologic and locational contexts as well as the surrounding area. Field observations were made at each site and included relevant data such as measurements and a detailed description of each artifact encountered.

Native American Participation

Part of the records search and literature review involved contacting the Native American Heritage Commission (NAHC) for a list of traditional use areas or sacred sites within the project area and a list of specific Native American groups or individuals who could provide additional information regarding cultural resources within the project area. A Sacred Lands File search request was submitted on September 20, 2022, and on November 3, 2022, the results came back negative. The NAHC provided a list of 21 contacts that could provide additional information regarding cultural resources within the project area and informal discussions began with the contacts provided by the NAHC at that time.

On November 28, 2022, the Quechan Tribe of the Fort Yuma Reservation indicated that they did not wish to comment. On December 5, 2022, the San Manuel Band of Mission Indians indicated that they would defer to local Tribes. On December 8, 2022, the Augustine Band of Cahuilla Indians responded that they have no specific archival information on the project area that would indicate sacred/religious or other Native American cultural importance. On December 6, 2022, the Los Coyotes Band of Cahuilla and Cupeño Indians, the Santa Rosa Band of Cahuilla Indians, and the Soboba Band of Luiseño Indians stated that their lack of response meant that they did not wish to comment and requested that comments be deferred to the Agua Caliente Band of Cahuilla Indians (ACBCI). On January 3, 2023, Lacy Padilla, of the Tribal Historic Preservation Office (THPO) for the ACBCI, responded by letter stating that although the project area is not within the boundaries of the ACBCI Reservation, it is within the Tribe's traditional use area. The ACBCI THPO requested copies of existing studies and records and the presence of Tribal monitors during earth moving activities for the project.

The City of Palm Springs initiated Tribal consultation, as required by AB 52. The consultation period started on May 24, 2023, and ended on June 24, 2023. The City sent six letters to local Tribal representatives that have requested consultation on new development projects. Of the six notices, only the Agua Caliente Band of Cahuilla Indians (ACBCI) and the Morongo Band of Mission Indians responded. The ACBCI stated that while the site is not within the ACBCI boundaries, it is within their Traditional Use Area and requested consultation (**Appendix E**). The Twentynine Palms and Morongo Band of Mission Indians deferred to Tribes more closely associated with the land. A complete discussion of Tribal Consultation is contained in Section 4.14 Tribal Cultural Resources.

Previous Studies in the Vicinity

The results of the records search indicated that 62 previous cultural resource investigations had been conducted within the records-search area. No previous studies involving the project area have been completed. The records search identified 37 previously recorded cultural resources within the records-search area. No previously recorded resources were identified within the project area. The 37 previously recorded resources identified within the 1-mile records-search buffer consisted of 33 historical period resources and 4 prehistoric resources. The historical period resources are 10 sites (7 refuse scatters; 1 site with foundations, a reservoir, footings for a water tank, and a refuse scatter; 1 transmission corridor; and 1 electrical substation), 4 roads/highways, 1 railroad structure, and 18 isolates (hole-in-top cans, glass bottles/fragments, porcelain insulators, and a ceramic doll head). The prehistoric resources are a ceramic-scatter site, 2 debitage isolates, and 1 percussion-tool isolate. None of the resources were found to be listed in the NRHP or the catalog of CHLs.

Project Impacts

a. Would the project cause a substantial adverse change in the significance of a historical resource as pursuant to section §15064.5?

Historical period resources refer to the built environment, such as buildings and structures over 45 years in age that may be eligible to be included in the National Register of Historic Places, the California Register of Historical Resources, the California Historical Resources Inventory, or local inventories. The records search did not result in any historical-period resources on the project site.

During the field survey, two isolates were recorded within the combined 58-acre survey area. The first isolate (ISO 1) was discovered in the 38-acre project area, near the eastern boundary. ISO 1 is an amber-glass bottle base with an Owens-Illinois Glass Company manufacturer's mark from the 1970's. The second isolate (ISO-2) consists of two ceramic sherds found within approximately 20-feet of each other in the southwestern corner of the 20-acre area to the west. The two isolates are recommended not eligible for listing in the California Register of Historical Resources (CRHR) because they fail to meet any of the four criteria to be eligible for listing in the CRHR. The artifacts lack associations with events that

have made a significant contribution to the broad patterns of California's history and cultural heritage (Criterion 1); cannot be shown to be associated with lives and persons important to our past (Criterion 2); do not embody 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 (Criterion 3); and are unlikely to yield information important in prehistory or history (Criterion 4).

Offsite impacts for the sewer connection during the construction of the project will occur in the existing disturbed right of way. As such, there are no historical resources as defined in Section 15064.5 of the State CEQA Guidelines located within the project site. The proposed project will not cause a substantial adverse change in the significance of a historical resource, and no mitigation is required.

b. Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?

As previously discussed, the project site had not been surveyed for cultural resources prior to the current project-specific report, and no cultural resources had been recorded within the project boundaries. Further, the field study did not identify any cultural resources within the project site.

EIC records indicate 4 prehistoric resources were recorded within 1-mile of the project area. The prehistoric resources are a ceramic scatter site, 2 debitage isolates, and 1 percussion tool isolate. None of these resources were found to be listed in the NRHP pr the catalog of CHLs. As described above, 2 isolates were discovered west of the project site during the field survey, consisting of two ceramic sherds found approximately 20-feet of each other in the southwestern corner of the 20-acre optional expansion area. The two isolates are not eligible for listing in the CRHR because they fail to meet any of the four criteria outlined above under discussion *a*.

The area where the isolates were found was closely examined, and no indications of an archaeological deposit were found to be present. However, because of the prehistoric ceramic sherds found adjacent to the project area and the isolated prehistoric artifacts previously documented in the records search area, the project area may be sensitive for buried archaeological resources. Uncovering these resources, and the potential for damage, would represent a potentially significant impact to archaeological resources which requires mitigation. Furthermore, the ACBCI has requested that a cultural resource monitor from the Tribe be present during ground-disturbing activities related to the project.

Mitigation Measure CUL-1 requires that archaeological monitoring be implemented to ensure that any unanticipated discoveries made during project-related ground disturbance activities are properly treated. With implementation to **MM CUL-1**, impacts to archaeological resources would be less than significant.

c. Would the project disturb any human remains, including those interred outside of dedicated cemeteries?

No human remains were found, are known to occur on the project site or are anticipated to be discovered during project construction. However, it is possible that human remains could be uncovered during construction activities. Therefore, pursuant to the California Health and Safety Code Section 7050.5, in the event of discovery of any human remains on the project site, there shall be no further excavation or disturbance of the site, or any nearby area reasonably suspected to overlay adjacent remains, until the County Coroner has examined the remains. If the coroner determines the remains to be Native American or has reason to believe that they are those of Native American, the coroner shall contact the NAHC within 24-hours, and the NAHC will be responsible for identifying the Most Likely Descendant (MLD) and contacting them for ongoing consultation and resolution. The project will be subject to these requirements during all construction and excavation activities. Compliance with the California Health and Safety Code will ensure that should there be a discovery of any human remains during project construction activities, impacts would be reduced to less than significant levels.

4.4.5 Cumulative Impacts

The build out of the General Plan area, including lands of the proposed project, has the potential to cumulatively impact cultural resources due to overall loss of archaeological and historical artifacts unique to the Coachella Valley.

Development of other projects within the City and surrounding area would also have the potential to result in impacts to cultural resources. Each development project submitted to the City is required to comply with CEQA review. If any potential impacts to archaeological resources are determined, projects will be subject to the same standard requirements, mitigation measures (as applicable), and compliance with federal and State law as the proposed project. These requirements and mitigation measures are designed to reduce impacts and preserve resources across the City and region.

Although continued development has the potential to cumulatively impact these resources, the continued application of City policies, General Plan policies and programs, federal and State law, will assure that cumulative impacts associated with cultural resources will be less than significant.

4.4.6 Mitigation Measures

CUL-1 Prior to ground disturbance (including clearing, grubbing, etc.) the applicant/developer will retain a qualified archaeological monitor and an ACBCI Tribal monitor to be present during all ground disturbing activities. If cultural materials are discovered during grading or excavation, the construction contractor shall cease all earthmoving activity within and around the immediate discovery area until a qualified archaeologist can assess the nature and significance of the find. An archaeological monitoring plan will be developed and implemented to ensure that any unanticipated discoveries made during project-related ground-disturbing activities are properly treated. The archaeologist, in consultation with ACBCI, shall be consulted to reduce or terminate monitoring when it is indicated by field conditions and as appropriate.

4.4.7 Level of Significance After Mitigation

With adherence to regulatory standards , the project would result in less than significant impacts to previously undiscovered buried human remains. **Mitigation Measure CUL-1** would reduce potential impacts to unknown archaeological resources to a less than significant level. No impacts to historic resources are anticipated. No significant and unavoidable impacts to archaeological resources would occur with implementation of this mitigation measure. After mitigation has been implemented, all anticipated impacts to cultural resources would be considered less than significant.

4.4.8 Resources

1. City of Palm Springs 2007 General Plan, Chapter 5 Recreation, Open Space & Conservation Element, accessed 2023.
2. Cultural Resources Assessment of the Proposed Indian Canyon Warehouse and Distribution Center, Statistical Research, Inc., February 2023.

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4.5 Energy Resources

4.5.1 Introduction

This section describes the potential impacts to energy resources from implementation of the proposed project. Appendix G of the CEQA Guidelines require that an EIR discuss the potential energy impacts of proposed projects, with particular emphasis on avoiding or reducing inefficient, wasteful, and unnecessary consumption of energy to ensure that energy is considered in project-related decision-making processes. Specifically, this section summarizes the existing conditions in the project area, discusses the regulatory framework, and discloses estimated energy use during the construction and operational phases of the proposed project.

Information for this section was obtained from the *N Indian Canyon/19th Avenue High-Cube Warehouse Energy Analysis*, April 2023 (**Appendix F**) and the *N Indian Canyon/19th Avenue High-Cube Warehouse Traffic Study* and *VMT Analysis* (**Appendix L.1** and **L.2**). The findings of the Energy Analysis are summarized below. Results for the project's energy analysis were provided by CalEEMod Version 2022.1 (also included in **Appendix F**). Additional documents relevant to the analysis of energy resources include the *Palm Springs General Plan*, *2016 Sustainability Plan, Climate Action Roadmap,* and *Climate Action Plan*. Sources used in the preparation are included in **Chapter 8.0, *References*,** at the end of this Draft EIR.

Section 4.2, *Air Quality*, **Section 4.7, *Greenhouse Gas Emission***, **Section 4.13, *Transportation,*** and **Section 4.15*, Utilities and Service Systems***, of this Draft EIR provide further discussion regarding the project's estimated energy use and infrastructure, as well as any associated environmental impacts. This portion of the Draft EIR primarily concentrates on energy consumption via electricity, natural gas, and petroleum (gasoline and diesel fuel).

4.5.2 Existing Conditions

The proposed project property occupies approximately 38 acres of vacant and undeveloped land west of Indian Canyon Drive and north of 19th Avenue in the City of Palm Springs. Major energy providers include Southern California Edison (SCE), and the Southern California Gas Company (The Gas Company or SoCalGas). Electricity and natural gas are the primary sources of stationary source energy consumption in the City.

Electricity

According to the Energy Information Administration (EIA), California used approximately 247,250 GWh of electricity in 2021. Residential uses utilized 36.5 percent of the State's electricity, followed by commercial uses which utilized 43.9 percent, industrial uses consumed 19.2 percent, and the

transportation sector consumed 0.3 percent. Electricity usage in California for differing land uses varies substantially by the type of uses in a building, type of construction materials used in a building, and the efficiency of all electricity-consuming devices within a building.

In 2021, total system electric generation for California was 277,764 GWh, 194,127 GWh or 70 percent of which was generated within the State; the rest was imported from the Pacific Northwest (12 percent), and the U.S. southwest (18 percent). Natural gas is the main source for electricity generation at 50.2 percent of the total in-state electric generation system power.

Electricity is currently provided to the project by SCE. SCE provides electric power to more than 15 million persons in 15 counties and in 180 incorporated cities, within a service area encompassing approximately 50,000 square miles. SCE derives electricity from varied energy resources including: fossil fuels, hydroelectric generators, nuclear power plants, geothermal power plants, solar power generation, and wind farms. SCE also purchases from independent power producers and utilities, including out-of-state suppliers.

According to the Edison International 2019 Sustainability Report, SCE delivered an estimated 48 percent carbon-free electricity to customers. This is an increase from the 46 percent renewable energy portfolio that SCE achieved in 2018.

Each year, SCE allocates capital funds for the purposes of converting overhead electric distribution lines. In addition, SCE provides a variety of energy conservation programs to City residents and businesses. These programs include:

- Rebates, incentives and saving tips including a Summer Discount Plan, Mobile Home Upgrade Program, Budget Assistant and Time-of-Use Plans.
- Incentives for using electric vehicles including the Clean Fuel Reward Program and the Charge Ready Home Installation rebate.
- Energy Management Center introduces new energy management products, programs, rebates and tools.

Electricity distribution lines in the project area are located above and underground.

The project will be required to connect to existing lines at the southwest corner of Indian Canyon Drive and 19th Avenue and connect to the site underground along the existing right-of-way. The closest energy facility to the project site is the Indigo Energy Facility located approximately 700 feet west of the project. The Indigo Energy Facility is a 136-megawatt (MW), natural gas, simple-cycle electric peak generating station. Additional substations in the project area include Garnet substation (0.60 miles south), Hugo Substation (0.65 miles southwest), and Devers Substation (2 miles northwest). SCE operates and maintains these facilities.

SCE is constantly upgrading and expanding their electricity distribution networks to ensure capacity and reliability with the anticipated growth within their service area. In recent years, the Devers Substation

received upgrades to equipment to achieve higher capacity as part of the West of Devers Upgrade Project.[1] Additionally, SCE's Greener[2] project proposes new and replacement pole and vault installation along Indian Canyon Drive, south of 18th Avenue, Karen Drive, and the Union Pacific Railroad. The continued updates to SCE's facilities increase capacity and reliability within the service area.

SCE has met or exceeded all Renewable Portfolio Standard requirements to date, procuring renewable energy from diverse renewable sources (listed above). This standard requires all California utilities to generate 33 percent of their electricity from renewables by 2020, 60 percent of their electricity from renewables by 2030, and 100 percent by 2045. SCE's Pathway 2045 program will achieve carbon neutrality by decarbonizing all sectors of the economy and will necessitate rigorous planning to keep energy safe, reliable, and affordable. Eighty gigawatts (GW) of new utility-scale clean generation and 30 GW of utility-scale energy storage will be required in the next 25 years.

Natural Gas

California accounts for less than 1 percent of total U.S. natural gas reserves and production. California imports 90 percent of its supply of natural gas. Natural gas from out-of-state production basins is delivered into California via the interstate natural gas pipeline system. As with crude oil, California's natural gas production has experienced a gradual decline since 1985. In 2019, about 37 percent of natural gas delivered to consumers went to the state's industrial sector, and about 28 percent was delivered to the electric power sector. Natural gas fueled more than two-fifths of the state's utility-scale electricity generation in 2019. The residential sector, where two-thirds of California households use natural gas for home heating, accounted for 22 percent of natural gas deliveries. The commercial sector received 12 percent of the deliveries to end users and the transportation sector consumed the remaining 1 percent.

According to the EIA, California used approximately 200,871 million therms of natural gas in 2021 (the most recent year for which data is available). In 2021, the industrial sector consumed 33 percent of the State's natural gas, the electric power sector consumed 30 percent, the residential sector consumed 21 percent, the commercial sector consumed 11 percent, the transportation sector consumed 1 percent, and the remaining 3 percent was utilized for operations, processing, and production of natural gas itself.

SoCalGas provides service to about 5.9 million customers. SoCalGas transports natural gas to the Coachella Valley through regional high-pressure lines. Limiting stations transfer the gas to supply lines with reduced pressure, which feed local accounts.

Existing 4-inch underground natural gas lines are located approximately a half-mile west, in 19th Avenue, provided by Southern California Gas Company. However, it is not anticipated that the project will utilize

[1] West of Devers Upgrade Project, SCE https://www.sce.com/about-us/reliability/upgrading-transmission/west-of-devers

[2] California EPA, State Water Resources Control Board, California Integrated Water Quality System Project https://ciwqs.waterboards.ca.gov/ciwqs/readOnly/CiwqsReportServlet?reportName=facilityAtAGlance&placeID=S899369

natural gas, apart from the use of exterior cargo handling equipment, which will be in operation up to four hours a day. Therefore, the project will not need to connect to the existing natural gas infrastructure.

Petroleum

State

According to the Department of Motor Vehicles, there are approximately 36.2 million registered vehicles in California, and those vehicles consumed an estimated 17.2 billion gallons of petroleum and diesel each year. California's on-road transportation system includes 396,616 lane miles, more than 26.6 million passenger vehicles and light trucks, and almost 9.0 million medium- and heavy-duty vehicles.

Per the CEC, transportation accounts for nearly 37 percent of California's total energy consumption. While gasoline consumption has been declining since 2008 it is still by far the dominant fuel. Petroleum-based fuels account for approximately 92 percent of California's transportation energy sources. Technological advances, market trends, consumer behavior, and government policies could result in significant changes to fuel consumption by type and in total. Various policies, rules, and regulations have been enacted to improve vehicle fuel efficiency, promote the development and use of alternative fuels, reduce transportation-source air pollutants and GHG emissions, and reduce vehicle miles traveled (VMT), at the federal and State levels. Technological advances have made use of other energy resources or alternative transportation modes increasingly feasible, as market forces have driven the price of petroleum products steadily upward.

Regional and Local

Project Petroleum

The project proposes a two-story, 739,360-square-foot fulfillment center with offices, and associated infrastructure (paved driveways and parking, landscaping, three gated access points, retention area, and perimeter fencing) on approximately 38 acres. It is anticipated that the project will have approximately 718 employees at buildout of the project, according to the *N Indian Canyon/19th Avenue Warehouse Vehicle Miles Traveled (VMT) Analysis,* provided in **Appendix L.2**. The daily trips to and from the project site are expected to total 2,134 passenger car equivalents (PCE). This value includes both employee trips and truck trips.

4.5.3 Regulatory Setting

Federal

Corporate Average Fuel Economy Standards

First established by the U.S. Congress in 1975, the Corporate Average Fuel Economy (CAFE) Standards reduce energy consumption by increasing the fuel economy of passenger cars and light trucks. The National Highway Traffic Safety Administration (NHTSA) and the EPA jointly administer the CAFE standards. The U.S. Congress has specified that CAFE standards must be set at the "maximum feasible level" with consideration given for: (1) technological feasibility; (2) economic practicality; (3) effect of other standards on fuel economy; and (4) need for the nation to conserve energy.

Federal Energy Regulatory Commission

The Federal Energy Regulatory Commission (FERC) is an independent agency that regulates the transmission and sale of electricity, natural gas, and oil in interstate commerce, licensing of hydroelectric projects, and oversight of related environmental matters. The setting and enforcing of interstate transmission sales is also regulated by FERC.

Federal Energy Policy and Conservation Act

In 1975, Congress enacted the Federal Energy Policy and Conservation Act to serve the nation's energy demands and promote feasibly attainable conservation methods. This act established the first fuel economy standards for on-road motor vehicles in the United States. Pursuant to the act, the National Highway Traffic Safety Administration is responsible for establishing additional vehicle standards. Fuel economy is determined based on each manufacturer's average fuel economy for the fleet of vehicles available for sale in the United States.

Intermodal Surface Transportation Efficiency Act of 1991

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

The Transportation Equity Act for the 21st Century

The Transportation Equity Act for the 21st Century (TEA-21) was signed into law in 1998 and builds on the initiatives established in the ISTEA legislation, discussed above. TEA-21 authorizes highway, highway safety, transit, and other efficient surface transportation programs. TEA-21 continues the program structure established for highways and transit under ISTEA, such as flexibility in the use of funds, emphasis on measures to improve the environment, and focus on a strong planning process as the foundation of informed transportation decisions. TEA-21 also provides for investment in research and its application to maximize the performance of the transportation system through, for example,

deployment of Intelligent Transportation Systems, to help improve operations and management of transportation systems and vehicle safety.

Energy Policy Act of 2005

The Energy Policy Act of 2005 addresses energy production in the United States, including (1) energy efficiency; (2) renewable energy; (3) oil and gas; (4) coal; (5) tribal energy; (6) nuclear matters and security; (7) vehicles and motor fuels, including ethanol; (8) hydrogen; (9) electricity; (10) energy tax incentives; (11) hydropower and geothermal energy; and (12) climate change technology. The act includes provisions such as increasing the amount of biofuel that must be mixed with gasoline sold in the United States and loan guarantees for entities that develop or use innovative technologies that avoid the by-production of GHGs.

Energy Independence and Security Act of 2007

On December 19, 2007, the Energy Independence and Security Act of 2007 (EISA) was signed into law. In addition to setting increased Corporate Average Fuel Economy standards for motor vehicles, the EISA includes other provisions related to energy efficiency:

- Renewable Fuel Standard (RFS) (Section 202)
- Appliance and Lighting Efficiency Standard (Sections 301-325)
- Building Energy Efficiency (Sections 411-441)

This federal legislation requires ever-increasing levels of renewable fuels to replace petroleum. The EPA is responsible for developing and implementing regulations to ensure that transportation fuel sold in the United States contains a minimum volume of renewable fuel.

Additional provisions of the EISA address energy savings in government and public institutions, promoting research for alternative energy, additional research in carbon capture, international energy programs, and the creation of “green” jobs.

State

Integrated Energy Policy Report (IEPR)

Senate Bill 1389 (Bowen, Chapter 568, Statues of 2002) requires the CEC to prepare a biennial integrated energy policy report that assesses major energy trends and issues facing the State’s electricity, natural gas, and transportation fuel sectors and provides policy recommendations to conserve resources; protect the environment; ensure reliable secure, and diverse energy supplies; enhance the State’s economy; and protect public health and safety (Public Resources Code Section 25301[a]). The CEC prepares these assessments and associated policy recommendations every two years, with updates in alternate years, as part of the Integrated Energy Policy Report.

The 2022 IEPR was adopted February 2023, and continues to work towards improving electricity, natural gas, and transportation fuel energy use in California. The 2022 IEPR introduces a new framework for embedding for embedding equity and environmental justice at the CEC and the California Energy Planning Library which allows for easier access to energy data and analytics for a wide range of users. Additionally, energy reliability, western electricity integration, gasoline cost factors and price spikes, the role of hydrogen in California's clean energy future, fossil gas transition and distributed energy resources are topics discussed within the 2022 IEPR.

State of California Energy Plan

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

California Code of Regulations Title 13, Section 2449(d)(3) and 2485

The California Air Resources Board (CARB) is responsible for enforcing California Code of Regulations (CCR) Title 13 Sections 2449(d)(3) and 2485, which limit idling from both on-road and off-road diesel-powered equipment.

California's Energy Efficiency Standards for Residential and Nonresidential Buildings

Located in CCR Title 24, Part 6 and commonly referred to as "Title 24", these energy efficiency standards were established in 1978 in response to a legislative mandate to reduce California's energy consumption. The goal of Title 24 energy standards is the reduction of energy use. The standards are updated periodically to allow consideration and possible incorporation of new energy efficiency technologies and methods. In December 2018, the CEC adopted the 2022 Building and Energy Efficiency Standards with the effective date beginning January 1, 2023. Title 24 of the California Administrative Code sets efficiency standards for new construction, regulating energy consumed for heating, cooling, ventilation, water heating, and lighting. These building efficiency standards are enforced through the City's building permit process.

Title 24 also includes Part 11, known as California's Green Building Standards (CALGreen). The CALGreen standard took effect in January 2011 and instituted mandatory minimum environmental performance standards for all ground-up new construction of commercial, low-rise residential, and State-owned buildings, as well as schools and hospitals. The 2022 CALGreen standards became effective on January 1, 2023. Part 11 establishes design and development methods that include environmentally responsible

site selection, building design, building siting and development. Design and development methods include the installation of short- and long-term bicycle parking, designated parking for clean air vehicles and EV charging stations, water conserving plumbing fixtures and fittings (i.e., water closets, urinals, showerheads, faucets and fountains), and measures to reduce outdoor water consumption (i.e., compliance with local ordinances). See *Energy Analysis* (**Appendix F**) for a full list of the mandatory measures.

Energy Action Plan II

The CEC, California Power Authority, and California Public Utilities Commission (CPUC) adopted an Energy Action Plan (EAP) to establish goals for California's energy future and a means to achieve these goals. EAP II supports and expands on the commitment of State agencies to cooperate and reflect on the energy actions since original EAP adoption. EAP II includes a coordinated implementation plan for state energy policies that have been articulated through Executive Orders, instructions to agencies, public positions, and appointees' statements; CEC's integrated Energy Policy Report; CPUC and CEC processes; agencies' policy forums; and legislative direction.

California's Renewable Portfolio Standards

First established in 2002 under Senate Bill (SB) 1078, California's Renewable Portfolio Standards (RPS) requires retail sellers of electric services to increase procurement from eligible renewable resources to 33 percent of total retail sales by 2020.

Clean Energy and Pollution Reduction Act of 2015 (SB 350)

In October 2015, the legislature approved, and the Governor signed SB 350, which reaffirms California's commitment to reducing its GHG emissions and addressing climate change. Key provisions include an increase in the renewables portfolio standard (RPS), higher energy efficiency requirements for buildings, initial strategies towards a regional electricity grid, and improved infrastructure for electric vehicle charging stations. Specifically, SB 350 requires the following to reduce statewide GHG emissions:

- Increase the amount of electricity procured from renewable energy sources from 33 percent to 50 percent by 2030, with interim targets of 40 percent by 2024, and 25 percent by 2027.
- Double the energy efficiency in existing buildings by 2030. This target will be achieved through the California Public Utility Commission (CPUC), the California Energy Commission (CEC), and local publicly owned utilities.
- Reorganize the Independent System Operator (ISO) to develop more regional electrify transmission markets and to improve accessibility in these markets, which will facilitate the growth of renewable energy markets in the western United States.

State Vehicle Standards

The CARB Advanced Clean Cars program for passenger vehicles and light trucks serves to reduce petroleum consumption by increasing the operating efficiencies of vehicles and accelerating the penetration of plug-in hybrid and zero-emission vehicles in California. CARB has also adopted regulations that enhance the operating efficiencies of various types of construction equipment. While such regulations primarily are adopted to reduce air pollution, co-benefits in the form of reduced petroleum consumption are common.

100 Percent Clean Energy Act of 2018

In September 2018, the legislature approved, and the Governor signed SB 100, which builds on the targets established in SB 1078 and SB 350. Most notably, SB 100 sets a goal of powering all retail electricity sold in California with renewable and zero-carbon resources. Additionally, SB 100 updates the interim renewables target from 50 percent to 60 percent by 2030.

Regional and Local

Desert Community Energy

The City of Palm Springs, along with SCE, implements plans to reduce electricity consumption by taking part in the Desert Community Energy (DCE), which is the community-based, locally controlled electricity provider serving Palm Springs. THE DCE provides renewable power sources such as solar, wind, and geothermal in addition to large hydroelectric (which is considered carbon free but not renewable) to their service area.

The DCE purchases electricity on behalf of the residents and businesses enrolled in the program. They offer two options to residents and businesses: Carbon Free, which provides a 100 percent carbon free product, and Desert Saver, which is less expensive than the Carbon Free program, because it does not provide 100 percent carbon free energy.

Palm Springs Municipal Code

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

- 8.04.065, Adoption of the California Energy Code, designates that the California Energy Code, including appendices, tables and indices, are adopted by reference as the Palm Springs Energy Code.
- 8.40, Transportation Demand Management, is intended to protect the public health, safety and welfare by reducing air pollution, traffic congestion and energy consumption attributable to vehicle trips and vehicle miles traveled.

Palm Springs General Plan

The City of Palm Springs General Plan is committed to reducing energy demand and consumption within the City. The City General Plan establishes goals, policies, and actions that will incorporate environmental responsibility into its daily management of residential, commercial, and industrial growth, education, energy and water use, air quality, transportation, waste reduction, recycling, economic development, and open space and natural habitats within the Recreation, Open Space and Conservation Element, and the Community Design Element. The Palm Springs General Plan establishes the following goals and policies related to energy conservation and efficiency.

Goal RC8: Employ the efficient, sustainable, and environmentally appropriate use and management of energy and mineral resources to ensure their availability for future generations.

Policy RC8.2 Support and encourage the use of alternative energy sources, such as cogeneration, solar, wind, ethanol and natural gas, fuel cell technologies, and other alternative and sustainable fuel sources and generating industries to provide more reliability in the supply of electricity to the City and to promote the development of clean, sustainable, and alternative energy industries in the City. The use of alternative energy sources should also be encouraged in the construction of new buildings and retrofit of existing buildings.

Policy RC8.3 Encourage and support the incorporation of energy efficiency and conservation practices in land use, transportation demand management, subdivision, and building design.

Policy RC8.4 Encourage "green technologies," renewable energy, and related activities as a business development goal and to attract this type of business activity to Palm Springs.

Policy RC8.5 Work with the Coachella Valley Association of Governments to develop a regional energy policy and foster the development of associated energy industries in the Coachella Valley.

Goal CD29: Establish the City as a leader in energy efficient and environmentally sustainable development and planning practices.

Policy CD29.1 Require the use of energy-efficient and green building practices that are appropriate to the desert climate. Developers should identify energy and resource savings measures that they have incorporated into their project.

Policy CD29.4 Require landscaping practices that increase energy efficiency and conserve natural resources, such as drought-tolerant landscaping, seasonally and locationally appropriate tree plantings, and natural drainage systems. These practices could include things such as desert-friendly landscaping on medians and other public lands.

Policy CD29.6 Encourage the use of solar energy systems and energy- and water-conserving appliances.

Policy CD29.7 Encourage infill development to make efficient use of existing land.

Policy CD29.8 Encourage on-site design practices that reduce stormwater runoff, including on-site retention, permeable paving, and increased native landscaping.

4.5.4 Project Impact Analysis

Thresholds of Significance

The following thresholds or criteria are derived from Appendix G of the CEQA Guidelines and are used to determine the level of potential effect. The significance determination is based on the recommended criteria set forth in Section 15064 of the CEQA Guidelines. For analysis purposes, development of the project would have a significant effect on energy resources if it is determined that the project will:

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?

Methodology

The analysis in this section is derived from the project-specific *Energy Analysis* and the California Emissions Estimator Model (CalEEMod) Version 2021.1, provided in **Appendix F**. The latest version of CalEEMod has been used to determine the proposed project's anticipated transportation and facility energy demands.

The EMFAC2021 emission inventory was used to estimate annual fuel consumption associated with vehicle usage during project construction and operational activities. Both models assume that the project would operate 24 hours daily, seven days per week.

Construction

Per the Energy Analysis, the physical construction of the project is anticipated to begin in January 2024 and will last through April 2025. The estimated construction schedule is shown in **Table 4.5-1**.

Table 4.5-1 Construction Duration

Construction Activity*	Start Date	End Date	Days
Site Preparation	1/8/2024	2/2/2024	20
Grading	2/5/2024	5/17/2024	75
Building Construction	4/5/2024	5/12/2025	287
Paving	3/3/2025	4/11/2025	30
Architectural Coating	2/7/2025	4/24/2025	55

* Construction phases taken from client data

Table 4.5-1 represents a worst-case analysis scenario because it analyzes a condensed realistic schedule. Should construction occur over a longer period of time, reduced overall emissions would be expected because emissions regulations are expected to become more stringent over time. It should also be noted that the project will not start construction in January 2024. It is more likely to start in January 2025 and end in April 2026. The 2025 start date does not impact the modeling completed for the construction duration dates of January 2024 to April 2025 because the length of construction duration stays the same.

A summary of construction equipment by phase is provided in the table below. Consistent with industry standards and typical construction practices, each piece of equipment will operate up to a total of eight (8) hours per day. For each equipment type, CalEEMod generates defaults for the fuel type, engine tier, number of equipment operating per day, daily operational hours per equipment, and the equipment horsepower and load factor.

Table 4.5-2 Construction Equipment Assumptions

Construction Activity	Equipment	Amount	Hours per Day[2]
Site Preparation	Rubber Tired Dozers	2	8
	Crawler Tractors[1]	2	8
Grading	Excavators	2	8
	Graders	1	8
	Rubber Tired Dozers	1	8
	Scrapers	2	8
	Crawler Tractors[1]	2	8
Building Construction	Cranes	2	8
	Forklifts	6	8
	Generator Sets	2	8
	Tractors/Loaders/Backhoes	6	8
	Welders	2	8
Paving	Pavers	2	8
	Paving Equipment	2	8
	Rollers	2	8
Architectural Coating	Air Compressors	1	8

1. Crawler Tractors replaced Tractors/Loaders/Backhoes to accurately calculate disturbance for site preparation and grading phases.

2. Standard 8-hour workdays.

In addition to physical construction of the project, the project is also required to connect to existing electrical infrastructure. The project will connect to existing electricity lines at the southeast corner of Indian Canyon Drive and 19th Avenue and connect to the site underground.

Project Construction Equipment Fuel Consumption

Project construction activity timeline estimates, construction equipment schedules, equipment power ratings, load factors, and associated fuel consumption estimates are provided in the table below. A detailed description of fuel consumption assumptions is provided in **Appendix F**. For the purposes of this analysis, the calculations are based on all construction equipment being diesel-powered. As presented in the table below, project construction activities would consume an estimated 98,374 gallons of diesel fuel. Project construction would stop at the end of construction, and would not require an on-going or permanent commitment of diesel fuel resources for this purpose.

Table 4.5-3 Construction Equipment Fuel Consumption Estimates

Construction Activity	Duration (Days)	Equipment	HP Rating	Quantity	Usage Hours[2]	Load Factor	HP-hrs/day	Total Fuel Consumption
Site Preparation	20	Rubber Tired Dozers	367	2	8	0.4	2,348	2,539
		Crawler Tractors[1]	87	2	8	0.43	599	647
Grading	75	Excavators	36	2	8	0.38	219	887
		Graders	148	1	8	0.41	485	1,968
		Rubber Tired Dozers	367	1	8	0.4	1,174	4,761
		Scrapers	423	2	8	0.48	3,249	13,170
		Crawler Tractors[1]	87	2	8	0.43	599	2,427
Building Construction	287	Cranes	367	2	8	0.29	1,703	26,418
		Forklifts	82	6	8	0.2	787	12,212
		Generator Sets	14	2	8	0.74	166	2,572
		Tractors/Loaders/Backhoes	84	6	8	0.37	1,492	23,144
		Welders	46	2	8	0.45	331	5,138
Paving	30	Pavers	81	2	8	0.42	544	883
		Paving Equipment	89	2	8	0.36	513	831
		Rollers	36	2	8	0.38	219	355
Architectural Coating	55	Air Compressors	37	1	8	0.48	142	422
Construction Fuel Demand (Gallons Diesel Fuel)								***98,374***

1. Crawler Tractors replaced Tractors/Loaders/Backhoes to accurately calculate disturbance for site preparation and grading phases.
2. Standard 8-hour workdays.

Construction Trips

Construction generates on-road vehicle emissions from vehicle usage for workers, vendors, and haul trucks commuting to and from the site. The number of workers, vendors, and haul trips are presented

in the table below. CalEEMod defaults for vendor trips have been adjusted based on a ratio of the total vendor trips to number of days of each subphase of activity.

Table 4.5-4 Construction Trips Per Day

Construction Activity	Worker Trips Per Day	Vendor Trips Per Day[1]	Hauling Trips Per Day
Site Preparation	10	6	0
Grading	20	24	0
Building Construction	311	91	0
Paving	15	0	0
Architectural Coating	62	0	0

1. Vendor Trips adjusted based on CalEEMod defaults for building construction and number days for site prep, grading and building construction.

Adjustments to the CalEEMod defaults include replacing Tractor/Loaders/Backhoes with Crawler Tractor to accurately calculate disturbance for site preparation and grading phases (see **Tables 4.5-2** and **4.5-3**); vendor trips adjusted based on CalEEMod defaults for building construction and number of days for site preparation, grading, and building construction (see **Table 4.5-4**). These adjustments to the modeling inputs for project construction generate more accurate outputs.

Operation

The proposed project will operate 24 hours a day, 365 days a year. CalEEMod Version 2022.1 and EMFAC2021 were utilized to determine operational energy consumption and vehicle trips.

Energy that would be consumed by project-generated traffic is determined using total vehicle and truck trips and miles traveled to the site, and estimated fuel economies of vehicles and trucks accessing the site. As with worker and vendors trips, operational vehicle fuel efficiencies were estimated using information generated within EMFAC2021.

Trip generation from automobiles and trucks generated by the project are consistent with other industrial uses of similar scale and configuration. Electricity usage associated with the project was calculated based on CalEEMod defaults. To determine emissions from passenger car vehicles, the CalEEMod defaults were utilized for trip length and trip purpose for the proposed industrial land uses. To determine emissions from trucks for the proposed industrial uses, the analysis incorporated the SCAQMD recommended truck trip length of 15.3 miles for 2-axle trucks, 14.2 miles 3-axle trucks, and 40 miles for 4 or more axle trucks and weighting the average trip lengths using traffic trip percentages taken from the Traffic Impact Analysis. The trip length function for the proposed industrial building use has been calculated to 35.51 miles and an assumption of 100 percent primary trips. This trip length assumption is higher than the CalEEMod default for trucks. These adjustments to the modeling defaults generated the outputs in Appendix 4.1 of the Energy Analysis (**Appendix F**).

Project Impacts

a. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation

Construction

During construction of the proposed project, energy resources would be consumed in the form of electricity and petroleum. As discussed below, construction activities, including the construction of the new building, typically do not involve the consumption of natural gas. Electricity consumed is associated with the conveyance of water used for dust control, and on a limited basis, powering lights, electronic equipment, or other construction activities necessitating electrical power. Petroleum-based fuels are associated with the use of off-road construction vehicles and equipment on the project site, construction worker travel to and from the site, and delivery and haul truck trips (e.g., hauling of demolition material to off-site reuse and disposal facilities).

Electricity

During construction of the proposed project, electricity would be consumed to supply and convey water for dust control and, on a limited basis, may be used to power lighting, and electronic equipment, and for onsite construction trailers.

In order to extrapolate electric usage, the 2023 National Construction Estimator was used to calculate a typical power cost per 1,000 square feet, and extended to calculate the project's total construction power cost, as demonstrated in **Table 4.5-5**.

Table 4.5-5 Construction Power Cost

Land Use	Power Cost (per 1,000 sf)	Size (1,000 sf)	Construction Duration (months)	Project Construction Power Cost
High-Cube Fulfillment Center Warehouse	$2.50	739.360	15	$27,726.00
Parking Lot	$2.50	308.405	15	$11,565.19
Other Non-Asphalt Surfaces	$2.50	544.500	15	$20,418.75
			Construction Power Cost	***$59,709.94***

Once annual costs were determined, SCE's general service rate schedule was used to determine to project's electrical usage. As of January 1, 2023, SCE's general service rate is $0.13 per kilowatt hours (kWh) for electricity for industrial services. By dividing the total cost by SCE's cost, total electricity usage from on-site project construction related activities was estimated to be approximately 453,310 kWh, as shown in **Table 4.5-6**.

Table 4.5-6 Construction Electricity Usage

Land Use	Power Cost (per 1,000 sf)	Project Construction Electricity Usage (kWh)
High-Cube Fulfillment Center Warehouse	$0.13	210,492
Parking Lot	$0.13	87,801
Other Non-Asphalt Surfaces	$0.13	155,016
Construction Electricity Usage		***453,310***

The estimated construction electricity usage represents approximately 12.3 percent of the project's estimated annual operational demand, which, percentage as discussed below, would be within the supply and infrastructure service capabilities of SCE. This is derived by taking the total amount of electricity usage during construction (453,310 kWh) and dividing that number by the total amount of electricity during operation (3,673,072 kWh) to obtain 12.3 percent. As determined below, the operational electricity use, which consumes approximately 8 times more electricity annually than construction electricity use, would not result in the wasteful and unnecessary consumption of energy. Therefore, since construction activities will only consume approximately 12.3 percent of project operational electricity consumption, construction-related electricity use will result in less than significant impacts (see operational discussion below).

Transportation Energy

Petroleum would be the primary energy resource consumed throughout construction of the project. Fuel consumed by construction equipment would be the primary energy resource expended over the course of construction, while VMT associated with the transportation of construction materials and construction worker commutes would also result in petroleum consumption. Heavy-duty equipment used for project construction would rely on diesel fuel. Construction workers would travel to and from the project site throughout the duration of construction in gasoline-powered passenger vehicles.

Construction Worker Fuel Estimates

With respect to estimated VMT for the project, the construction worker trips (personal vehicles used by workers commuting to the project from home) would generate an estimated 1,761,367 VMT during the 15 months of construction. Based on CalEEMod methodology, it is assumed that 50 percent of all construction worker vehicle trips are from light-duty-auto vehicles (LDA), 25 percent are from light-duty-trucks (LDT1), and 25 percent are from light-duty-trucks (LDT2). Data regarding project related construction worker trips were based on CalEEMod defaults utilized in the Air Quality Impact Analysis.

EMFAC2021 was run for the LDA, LDT1, and LDT2 vehicle class within the Riverside sub-area for the 2024 through 2025 calendar years.

Table 4.5-7, below, provides an estimated annual fuel consumption resulting from project construction worker trips, which were estimated in **Table 4.5-4**. It is estimated that 64,768 gallons of fuel will be consumed related to construction worker trips during construction of the project.

Table 4.5-7 Construction Worker Fuel Consumption Estimates

Year	Construction Activity	Duration (Days)	Worker Trips/Day	Trip Length (miles)	VMT	Average Vehicle Fuel Economy (mpg)	Estimated Fuel Consumption (gallons)
2024	LDA						
	Site Preparation	20	5	18.5	1,850	31.15	59
	Grading	75	10	18.5	13,875	31.15	445
	Building Construction	193	156	18.5	556,998	31.15	17,882
	LDT1						
	Site Preparation	20	3	18.5	1,110	23.65	47
	Grading	75	5	18.5	6,938	23.65	293
	Building Construction	193	78	18.5	278,499	23.65	11,775
	LDT2						
	Site Preparation	20	3	18.5	1,110	23.77	47
	Grading	75	5	18.5	6,938	23.77	292
	Building Construction	193	78	18.5	278,499	23.77	11,716
2025	LDA						
	Building Construction	94	156	18.5	271,284	32.28	8,405
	Paving	30	8	18.5	4,400	32.28	138
	Architectural Coating	55	31	18.5	31,543	32.28	977
	LDT1						
	Building Construction	94	78	18.5	135,642	24.14	5,619
	Paving	30	4	18.5	2,220	24.14	92
	Architectural Coating	55	16	18.5	16,280	24.14	674
	LDT2						
	Building Construction	94	78	18.5	135,642	24.44	5,550
	Paving	30	4	18.5	2,220	24.44	91
	Architectural Coating	55	16	18.5	16,280	24.44	666
Total Construction Worker Fuel Consumption							***64,768***

Construction Vendor/Hauling Fuel Estimates

With respect to estimated VMT, the construction vendor trips and haul trips (vehicles that deliver materials to the site during construction) would generate an estimated 144,452 VMT along area roadways for the project over the duration of construction activity. It is assumed that 50 percent of all vendor trips are from medium-heavy duty trucks (MHD), 50 percent of all vendor trips are from heavy-

heavy duty trucks (HHD), and 100 percent of all hauling trips are from HHDs, consistent with the CalEEMod assumptions provided in **Appendix F**. EMFAC2021 was run for the MHD and HHD vehicle classes within the Riverside sub-area for the 2024 and 2025 calendar years.

As shown in **Table 4.5-8**, it is estimated that 42,168 gallons of fuel will be consumed related to construction vendor and haul trips during construction of the project.

Table 4.5-8 Construction Vendor Fuel Consumption Estimates

Year	Construction Activity	Duration (Days)	Vendor/ Hauling Trips/Day	Trip Length (miles)	VMT	Average Vehicle Fuel Economy (mpg)	Estimated Fuel Consumption (gallons)
2024	MHDT						
	Site Preparation	20	3	10.2	612	7.58	81
	Grading	75	12	10.2	9,180	7.58	1,211
	Building Construction	193	46	10.2	90,556	7.58	11,945
	HHDT (Vendor)						
	Site Preparation	20	3	10.2	612	6.19	99
	Grading	75	12	10.2	9,180	6.19	1,482
	Building Construction	193	46	10.2	90,556	6.19	14,621
2025	MHDT						
	Building Construction	94	46	10.2	44,105	7.67	5,747
	HHDT (Vendor)						
	Building Construction	94	46	10.2	44,105	6.32	6,983
Total Construction Vendor Fuel Consumption							***42,168***

Construction Energy Efficiency/Conservation Measures

As described above under Regulatory Setting, CARB established regulations aimed at cleaning up off-road construction equipment such as bulldozers, graders, and backhoes. These requirements ensure fleets gradually turn over the oldest and dirtiest equipment to newer, cleaner models and prevent fleets from adding older, dirtier equipment. The equipment used for project construction will be required to conform to CARB regulations and California emissions standards. It should also be noted that there are no unusual project characteristics or construction processes that would require the use of equipment that would be more energy intensive than is used for comparable activities; or equipment that would not conform to current emissions standards (and related fuel efficiencies).

Additionally, CARB has adopted the Airborne Toxic Control Measure to limit heavy-duty diesel motor vehicle idling in order to reduce public exposure to diesel particulate matter and other Toxic Air Contaminants. Compliance with anti-idling and emissions regulations would result in a more efficient use of construction-related energy and the minimization or elimination of wasteful or unnecessary

consumption of energy. Idling restrictions and the use of newer engines and equipment would result in less fuel combustion and energy consumption.

Additional construction-source energy efficiencies would occur due to required California regulations and best available control measures (BACM). For example, CCR Title 13, Motor Vehicles, section 2449(d)(3) Idling, limits idling times of construction vehicles to no more than five minutes, thereby precluding unnecessary and wasteful consumption of fuel due to unproductive idling of construction equipment. Enforcement of idling limitations is realized through periodic site inspections conducted by City building officials, and/or in response to citizen complaints.

Equipment and vehicles employed during construction of the project would therefore not result in inefficient wasteful, or unnecessary consumption of fuel.

Construction Energy Consumption Conclusion

As shown in **Table 4.5-9*, Summary of Energy Use During Construction***, a total of 453,310 kilowatt-hours (kWh) of electricity, 98,374 gallons of diesel fuel, and 64,768 gallons of gasoline are estimated to be consumed in total during the construction of the project. Construction of the project is anticipated to be complete in 2025 (see **Table 4.5-1, *Construction Duration***).

Table 4.5-9 Summary of Energy Use During Construction

Fuel Type	Units	Total Project Energy Use
Electricity	kWh	453,310
Diesel	Gallons	98,374
Gasoline	Gallons	64,768

As stated above, the estimated construction electricity usage represents approximately 12.3 percent of the project's estimated annual operational demand, which, percentage as discussed below, would be within the supply and infrastructure service capabilities of SCE. As determined in the discussion below (*Operation* subheading), the operational electricity use consumes approximately 8 times more electricity annually than construction electricity use, would not result in the wasteful and unnecessary consumption of energy. Therefore, since construction activities will only consume approximately 12.3 percent of project operations electricity consumption, project construction electricity use will result in less than significant impacts (see operational discussion below). No natural gas would be consumed during construction of the project. Finally, the equipment used for project construction would conform to CARB regulations and California emissions standards, implementing idling restrictions and the use of newer engines and equipment, which would result in less fuel combustion and energy consumption. The construction of the project would therefore not result in inefficient wasteful, or unnecessary consumption of energy resources.

Operation

Energy consumption related to project operations would include transportation fuel demands (fuel consumed by passenger car and truck vehicles accessing the project site), fuel demands from operational equipment, and facilities energy demands (energy consumed by building operations and site maintenance activities). Building operations would involve energy consumption for multiple purposes including, but not limited to, building heating and cooling, refrigeration, lighting, and electronics.

Electricity

The CalEEMod program utilized in this analysis calculated the project's potential operational electricity usage by splitting up the land uses into appropriate categories. The categories consistent with the proposed project include High-Cube Fulfillment Center Warehouse and Parking Lot.

Project electricity and natural gas consumption is forecasted in the table below. The project is expected to generate demand for approximately 3,673,072 kilo-Watt hours (kWh) of annual electricity use for the entire project at build-out. Based on information provided by the project applicant, the project would not use natural gas for the building envelope. As such, natural gas consumption was not analyzed.

Table 4.5-10 Project Electricity Demand

Land Use	**Electricity Demand** kWh/yr
High-Cube Fulfillment Center Warehouse	3,402,795
Parking Lot	270,277
Total Electricity Demand	**3,673,072**

On-Site Cargo Handling Equipment Fuel Demands

The project's operational consumption of natural gas will include the use of exterior cargo handling equipment involving up to four (4) 200 horsepower (hp), natural gas-powered cargo handling equipment – port tractors conservatively operating at 4 hours a day for 365 days of the year. Project operational activity estimates and associated fuel consumption estimates are based on the annual EMFAC2021 offroad[3] emissions for the 2025 operational year and were used to derive the total annual fuel consumption associated on-site equipment. As presented in the table below, project on-site equipment would consume an estimated 13,926 gallons of natural gas, which is equivalent to 1,273,560.6 kBTU and 1,236,466.6 cf of natural gas.

[3] The distinction is on-road vehicles are street legal i.e., vehicles that are certified by their manufacturer with the U.S. Department of Transportation (DOT), National Highway Traffic Administration (NHTSA), as compliant with on-highway safety standards as well as certified to all applicable ARB and U.S. EPA on-road emission standards. Off-road vehicles such as cargo handling equipment are used for moving trailers and containers short distances around the project site.

Table 4.5-11 On-Site Cargo Handling Equipment Fuel Consumption Estimates

Equipment	Quantity	Usage Hours[1]	Days of Operation	EMFAC2021 Fuel Consumption (gal/yr)	EMFAC2021 Activity (hrs/day)	Total Fuel Consumption Natural Gas[2]
Cargo Handling Equipment	2	4	365	18,339	5,768	13,926 Gallons
						1,273,560.6 kBTU
						1,236,466.6 cf

1. Although the Project would operate 24-hours daily for seven days per week, this equipment is not expected to be operating for 24 hours a day. The assumptions for the usage hours and quantity of equipment was based on Table II-3, Port and Rail Cargo Handling Equipment Demographics by Type, from CARB's Technology Assessment: Mobile Cargo Handling Equipment document,
2. Conversion rates from the US Energy Information Administration (EIA) https://www.eia.gov/energyexplained/units-and-calculators/

Operational Energy Efficiency/Conservation Measures

The proposed project will be designed and constructed in accordance with the City's latest adopted energy efficiency standards, which are based on the California Title 24 energy efficiency standards. Title 24 standards include a broad set of energy conservation requirements that apply to the structural, mechanical, electrical, and plumbing systems in a building, as described under Regulatory Setting above. Title 24 standards are widely regarded as the most advanced energy efficiency standards, would help reduce the amount of energy required for lighting, water heating, and heating and air conditioning in buildings and promote energy conservation.

SCE's planning area consumed approximately 103,045 GWh electricity in 2021. According to the CEC's Demand Analysis Office, SCE estimates that electricity consumption within SCE's planning area will be approximately 129,000 GWh (which is 129,000,000 MWh) annually by 2030. Based on the project's estimated annual electrical consumption of 3,673,072 kWh, the project would account for approximately 0.003 percent of SCE's total estimated demand in 2030.

SCE analyzes their existing facilities and capacity to support the population and future growth within the service area in order to ensure reliable service. Additionally, SCE continues to invest in alternative and renewable energy sources and storage of renewable energy, to provide alternative energy to the service area. The 2021 SCE Power Mix has renewable energy at 31.4% of the overall energy resources used to meet demand. Geothermal resources are at 5.7%, wind power is at 10.2%, large hydroelectric sources are at 2.3%, solar energy is at 14.9%, and coal is at 0%. SCE is constantly upgrading and expanding their electricity distribution networks, including surrounding substations (such as Devers Substation) and infrastructure (i.e., surrounding poles and equipment), as described above. Based on SCE's review of the project, with the project's connection to SCE's infrastructure, it is anticipated that SCE's existing and planned electricity capacity and electricity supplies would be sufficient to support the project's demand and would not result in a significant increase in energy demand.

While the project would result in a long-term increase in demand for electricity, the project would be required to comply with Title 24 and CALGreen requirements related to energy efficiency. Impacts will be less than significant.

Based on the 2018 California Gas Report, the California Energy and Electric Utilities estimates natural gas consumption within SoCalGas's planning area will be approximately 2.31 million cf per day in 2030. On-site cargo handling equipment used during operation of the project would consume approximately 0.15 percent of the 2030 forecasted consumption in SoCalGas's planning area. Therefore, the project will result in less than significant impacts relating to the wasteful use of natural gas.

Transportation Energy

Energy that would be consumed by project-generated traffic is a function of a total estimated annual fuel consumption for all classes of vehicles (autos to heavy trucks, considering estimated vehicle fuel economies) accessing the project site. As with worker and vendor trips, operational vehicle fuel efficiencies were estimated using information generated within EMFAC2021.

Table 4.5-12 Total Project-Generated Traffic Annual Fuel Consumption

Vehicle Type	Average Vehicle Fuel Economy (mpg)	Annual Miles Driven	Estimated Annual Fuel Consumption (gallons)
LDA	32.28	5,672,062	175,736
LDT1	24.14	508,827	21,076
LDT2	24.44	2,808,597	114,913
MDV	20.03	1,965,451	98,108
MCY	42.88	222,190	5,182
LHD1	16.40	253,324	15,450
LDH2	14.96	77,101	5,155
MHDT	7.67	330,425	43,054
HHDT	6.32	2,423,114	383,635
	Total (All Vehicles)	***14,261,090***	***862,311***

As summarized in the above table, the project would result in a net total of 14,261,090 miles driven annually, and fuel consumption of 862,311 gallons.

Enhanced Vehicle Fuel Efficiencies

Project annual fuel consumption estimates presented in **Tables 4.5-11** and **4.5-12** represent likely potential maximums that would occur for the project. Average fuel economies of vehicles accessing the project site can be expected to improve as older, less fuel-efficient vehicles are removed from circulation, and in response to fuel economy and emissions standards imposed on newer vehicles entering the circulation system.

Enhanced fuel economies realized pursuant to federal and State regulatory actions, and related transition of vehicles to alternative energy sources (e.g., electricity, natural gas, biofuels, hydrogen cells) would likely decrease future gasoline fuel demands per miles driven associated with the vehicle (via automobile, heavy truck, etc.). The location of the project within 0.3 miles of an Interstate 10 interchange

also tends to reduce the miles driven by all vehicle classes accessing the site within the region, acting to reduce regional vehicle energy demands.

California's Senate Bill 350 was established in 2015 to reduce petroleum use by 50 percent by the year 2030, compared to 2015 consumption. This is achieved through advancement of technology, which includes the use of plug-in hybrid and zero emission vehicles in California. Operation of the project is therefore expected to use decreasing amounts of petroleum over time. Petroleum consumption associated with the project operation would not be considered excessive or wasteful, and impacts would be less than significant.

Conclusion – Operational Energy Consumption

Impacts to nonrenewable energy resources are anticipated to be less than significant with the development of the proposed project. The project would not result in the use of excessive amounts of fuel or electricity and would not result in the need to develop additional sources of energy. As shown in **Table 4.5-13, *Summary of Annual Energy Use During Operation***, the project's new energy demand would be approximately 3,673,072 kWh of electricity per year, 1,273,560.6 kBTU of natural gas per year, and 862,311 gallons of petroleum fuel per year. The project's buildout outputs are displayed in the table below.

Table 4.5-13, Summary of Annual Energy Use During Operation

Source	Units [1]	Project Buildout
Electricity Total	kWh	3,673,072
Natural Gas Total	kBTU	1,273,560.6
Petroleum Total	Gallons	862,311

1. kWh/year = thousand kilowatt-hours per year; kBTU/yr = thousand British Thermal Units per year. Electricity and Natural Gas for the project is total operational usage.
2. The project's operational consumption of natural gas will be limited to the use of exterior cargo handling equipment. This would consume 13,926 gallons (per EMFAC2021) or 1,273,560.6 kBTU.

b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency

The proposed project's consistency with relevant state and local plans for renewable energy or energy efficiency is provided below.

CARB Standards

The equipment used for project construction would conform to CARB regulations and California emissions standards as a common industry standard and project condition of approval.

Construction contractors would be required to comply with applicable CARB regulation regarding retrofitting, repowering, or replacement of diesel off-road construction equipment. Compliance with

anti-idling and emissions regulations would result in a more efficient use of construction-related energy and the minimization or elimination of wasteful or unnecessary consumption of energy.

Overall, the project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency (i.e., AB 1493 and CARB standards).

Title 24

Title 24's Building Energy Efficiency Standards, is designed to reduce wasteful and unnecessary energy consumption in newly constructed and existing buildings. The City currently implements the 2022 Building Energy Efficiency Standards. This code encourages efficient electric heat pumps, establishes electric-ready requirements for new homes, expands solar photovoltaic and battery storage standards, strengthens ventilation standards, and more in order to achieve the State's goal of carbon neutrality by midcentury.

The project will be required to meet the standards of Title 24. Title 24 standards include a broad set of energy conservation requirements that apply to the structural, mechanical, electrical, and plumbing systems in a building. For example, the Title 24 Lighting Power Density requirements define the maximum wattage of lighting that can be used in a building based on its square footage. Title 24 standards also require the installation of bicycle parking, EV charging stations, and water conserving plumbing fixtures and fittings. The project will also install photovoltaic panels to produce 30 percent of project power.

Palm Springs General Plan

The Palm Springs General Plan is a document that sets the vision and guidelines for future development in the community, using the goals, policies, and actions outlined in the plan to make development decisions. The General Plan includes goals and policies related to energy resources in the Recreation, Open Space and Conservation Element, and the Community Design Element.

Goals, policies, and programs related to reducing energy consumption, through the use of alternative forms of energy or sustainable design features are required for the proposed project:

- Pedestrian connections shall be provided to surrounding areas. The project would provide a sidewalks that connect to all existing or planned external streets and pedestrian facilities contiguous to the project site.
- The project will include building shells and building components, such as windows; roof systems; electrical and lighting systems; and heating, ventilating, and air conditioning systems to meet 2022 Title 24 Standards.
- The project will include short-term and long-term bicycle parking and designated parking for clean air vehicles and carpool/van pool vehicles to encourage alternative transportation.
- The project will install water conserving plumbing fixtures and fittings and landscape design.

The project is compliant with Policy RC8.3 of the Recreation, Open Space and Conservation Element of the Palm Springs General Plan, which supports the incorporation of energy efficiency and conservation practices in land use, transportation demand management, subdivision, and building design.

Community Design Element

The Community Design Element of the General Plan outlines policies and programs to reduce energy consumption in the City, including energy conservation in lighting and the compliance of Title 24 outdoor lighting zone standards (Policy CD11.7), the implementation of energy-efficient and green building practices that are appropriate to the desert climate (CD29.1), and the installation of drought-tolerant landscaping, seasonally and locationally appropriate tree plantings, and natural drainage systems to conserve water resources (CD29.4). As stated above, the project will comply with Title 24 codes and standards and proposes drought-tolerant landscaping and water conservation methods.

Conclusion

The proposed project will implement all State and local requirements, and be constructed to the most current Building Code standards. As demonstrated above, the proposed project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. Therefore, impacts would be less than significant.

4.5.5 Cumulative Impacts

Potential cumulative impacts on energy resources would result if the proposed project, in combination with present and future projects, would result in the wasteful or inefficient use of energy. This could result from development that would not incorporate sufficient building energy efficiency features or achieve building energy efficiency standards, or that would result in unnecessary use of energy during construction and/or operation. The cumulative analysis for the project site considers the geographic context of General Plan buildout. Growth within the City is anticipated to increase the demand for electricity, natural gas, and transportation energy, as well as the need for energy infrastructure, such as new or expanded facilities.

Like most active development projects in Palm Springs, construction and operation of the proposed project would result in an increase in the consumption of electricity and transportation-related energy. Buildout of Palm Springs includes the development and operation of vacant areas near the proposed project. These vacant properties are designated for industrial uses, regional businesses, and wind energy conversion systems (WECS). Future projects, such as industrial or regional businesses within the City would contribute incrementally to local increases in energy consumption. However, they would not result in wasteful, inefficient, or unnecessary use of energy because, as with the proposed project, future projects will implement Building Code requirements, include the installation of energy efficient appliances and efficient water fixtures and zero-net-energy designs through the installation of PV solar

panels. Future projects would be subject to the California Building Code, including California Energy Code and Cal Green, an evolving set of energy efficiency standards for residential and nonresidential buildings implemented to minimize the wasteful and inefficient use of energy. The proposed project and other future development projects would be expected to incorporate energy conservation features, comply with applicable regulations including CALGreen and State energy standards under Title 24, and incorporate energy design features, as required. Increased efficiency, both in construction materials and fixture design, will apply not only to the proposed project, but to all projects developed in the City. Therefore, the project's contribution to cumulative impacts related to wasteful, inefficient and unnecessary use of electricity would not be cumulatively considerable and, thus, would be less than significant.

Future development would also be subject to even more stringent requirements, such as the objectives set in the CARB Scoping Plan (2022), which would result in less fuel combustion and energy consumption to achieve carbon neutrality by 2045. The equipment used for project and future project construction would conform to CARB regulations and California emissions standards. Construction contractors would be required to comply with applicable CARB regulation regarding retrofitting, repowering, or replacement of diesel off-road construction equipment. Compliance with anti-idling and emissions regulations would result in a more efficient use of construction-related energy and the minimization or elimination of wasteful or unnecessary consumption of energy. Therefore, the cumulative impacts of the proposed project on energy resources are considered less than significant.

4.5.6 Mitigation Measures

No mitigation measures are necessary.

4.5.7 Level of Significance After Mitigation

Compliance with existing State, regional, and City regulations, plans, and programs, in addition to the incorporation of the use of energy efficient building materials, would ensure that project impacts related to energy resources would be less than significant.

4.5.8 Resources

1. CARB, EMFAC2017 Web Database, available at https://arb.ca.gov/emfac/
2. California Energy Demand 2018-2030 Revised Forecast, California Energy Commission, Demand Analysis Office, February 2018.
3. California Public Utilities Commission, 2018 California Gas Report, pg 103.
4. Corporate Average Fuel Economy, National Highway Traffic Safety Administration, available at https://www.nhtsa.gov/laws-regulations/corporate-average-fuel-economy.

5. California Energy Commission (CEC), California Energy Consumption Database, "Electricity Consumption by Planning Area", http://www.ecdms.energy.ca.gov/elecbyplan.aspx
6. Greenhouse Gas Equivalencies Calculator – Calculations and References, Environmental Protection Agency, https://www.epa.gov/energy/greenhouse-gases-equivalencies-calculator-calculations-and-references.
7. Natural Gas and California, California Public Utilities Commission, https://www.cpuc.ca.gov/natural_gas/.
8. Sustainability Plan, Palm Springs, May 2016, https://www.palmspringsca.gov/home/showpublisheddocument/44449/636056446346970000
9. Climate Action Plan, Palm Springs, May 2013, https://www.palmspringsca.gov/home/showpublisheddocument/71620/637146749779330000
10. Climate Action Roadmap, Palm Springs, October 2021, https://www.palmspringsca.gov/home/showpublisheddocument/82060/637859794824230000
11. Circuit Reliability Review Palm Springs, Southern California Edison, 2023, https://www.sce.com/outage-center/outage-information/reliability-reports

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4.6 Geology and Soils

4.6.1 Introduction

This section describes the existing setting and proposed improvements to the project site that could result in the placement of habitable structures in an area of known geologic hazards. This section is based on the information contained in the revised *Geotechnical Investigation* ("Geotechnical Investigation"), prepared by Petra Geosciences, Inc. (Petra) in March 2023; the *City of Palm Springs General Plan (2007)*, the *City of Palm Springs General Plan, Safety Element (2022 Update);* the *2020 Coachella Valley Regional Urban Water Management Plan;* the *County of Riverside Environmental Impact Report No. 521; Flood & Blowsand Risk Assessment and Improvement Plan for Western Coachella Valley* prepared for Coachella Valley Association of Governments in 2020; and the 2010, Geologic Map of California, Version 2.0 (California Geological Survey 150th Anniversary Edition), Department of Conservation, California Geological Survey. The project's Geotechnical Investigation is included in the EIR in **Appendix G**.

Prior to the preparation of the Draft EIR, an Initial Study was prepared and is included in **Appendix A**. Following the screening criterion related to geology and soils in the NOP, threshold topic "a" i, iii, iv, and topic "e" do not require additional analysis in this Draft EIR.

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.

iii.) Seismic-related ground failure, including liquefaction?

iv.) Landslides?

e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater.

Due to the proposed project's distance from faults, rupture at the site is not anticipated to occur. The closest fault, the San Andres Fault Banning Branch, is 0.3 miles northeast of the project site. The proposed project's location and surrounding parcels exist on relatively flat land, making rockfalls and landslides unlikely to affect either the project site or offsite improvements. No groundwater was encountered to a maximum depth of 66 feet below ground surface during the subsurface exploration of this site, concluding that seismically-induced liquefaction is unlikely to affect either the project site

or offsite improvements. Therefore, the project will have no impacts under threshold topic "a" i, iii, and iv.

Additionally, the proposed project would connect to Mission Springs Water District's wastewater collection system and does not include use of any septic tanks or alternative disposal systems; therefore, topic "e" does not apply to the project. Other thresholds specific to geology and soils are addressed in detail in this chapter.

4.6.2 Existing Conditions

The project site is located within the City of Palm Springs, in the Coachella Valley, in Riverside County. The Coachella Valley is located within the Colorado Desert, and the site lies within the northern portion of the Colorado Desert Geomorphic Province (CDGP) and the Salton Trough. The Salton Trough is a large north-west-trending structural basin that extends approximately 180 miles from the San Gorgonio Pass to the Gulf of California. Part of this basin, including the Salton Sea, lies below sea level and has steadily been filling with sediment eroded from local mountain ranges, as well as sediments from the Colorado River and by incursions by the Gulf of California since at least the late-Miocene Epoch. Sediments within the Salton Trough are estimated to be two to five miles thick. Such sediments include alluvium and colluvium.

Topography

The site slopes gently to the south with elevations of about 790 feet above mean sea level (MSL) along the northern boundary to about 765 feet MSL along the southern boundary. Garnet Hill and Whitewater Hill are the closest landmarks that contain unstable soil types. The base of Garnet Hill is approximately 0.75 miles southeast to the project site, and the base of Edom Hill is approximately 4.9 miles east to the project site. These areas would not affect the project site if slope failure occurred. The project site is surrounded by relatively flat land and is not at risk of landslides on or adjacent to the site.

Soils

A regional geologic map of the Palm Springs area indicates that Holocene to Late Pleistocene young alluvial fan deposits are mapped underlying the project property. These deposits are described as unconsolidated to slightly consolidated, undissected to slightly dissected boulder, cobble, gravel, sand, and silt deposits issued from a confining valley or canyon. Near-surface compressible native soils underlying undocumented fill soils are also present at the project site. Such materials consist of surficial topsoil/colluvium/alluvium.

According to the United States Department of Agriculture Web Soil Survey, the native soil contained on the site is Caristas soil. Carsitas soil is characterized by gravelly sand in the first foot below the surface, with more gravelly coarse sand up to 5 feet underground. This type of soil is typical of soils

present in Palm Springs. See Section 4.6.4, *Methodology*, of this ***Geology and Soils*** Section for further discussion of the project-specific Geotechnical Investigation conducted at the site.

Paleontological Resources

Paleontological resources represent the remains of prehistoric life, exclusive of any human remains, and include the localities where fossils were collected as well as the sedimentary rock formations in which they were found. The defining character of fossils or fossil deposits is their geologic age, which is typically regarded as older than approximately 12,000 years, the generally accepted temporal boundary marking the end of the last late Pleistocene (circa 2.6 million to 12,000 years B.P.) glaciation and the beginning of the current Holocene epoch (circa 12,000 years B.P. to the present). In the Coachella Valley, fossils are commonly found within lacustrine sediments associated with ancient Lake Cahuilla. During the last high stand of the lake in the late 17th century, the shoreline reached the present-day 42-foot elevation contour. In comparison, the site is at elevations of about 790 feet above mean sea level (MSL) along the northern boundary to about 765 feet MSL along the southern margin.

Common fossil remains in the eastern Valley include marine shells; the bones and teeth of fish, amphibians, reptiles, and mammals; leaf assemblages; and petrified wood. Fossil traces, another type of paleontological resource, include internal and external molds (impressions) and casts created by these organisms. These items can serve as important guides to the age of the rocks and sediments in which they are contained and may prove useful in determining the temporal relationships between rock deposits from one area and those from another as well as the timing of geologic events. They can also provide information regarding evolutionary relationships, development trends, and environmental conditions.

Fossil resources generally occur only in areas of sedimentary rock (e.g. sandstone, siltstone, mudstone, claystone, or shale). Because of the infrequency of fossil preservation, fossils, particularly vertebrate fossils, are considered nonrenewable paleontological resources. Occasionally fossils may be exposed at the surface through the process of natural erosion or because of human disturbances; however, they generally lay buried beneath the surficial soils. Thus, the absence of fossils on the surface does not preclude the possibility of their being present within subsurface deposits, while the presence of fossils at the surface is often a good indication that more remains may be found in the subsurface.

Paleontological resources can be considered to be of significant scientific interest if they meet one or more of the following criteria:

1. The fossils provide information on the evolutionary relationships and developmental trends among organisms, living or extinct;

2. The fossils provide data useful in determining the age(s) of the rock unit or sedimentary stratum, including data important in determining the depositional history of the region and the timing of geologic events therein;
3. The fossils provide data regarding the development of biological communities or interaction between paleobotanical and paleozoological biotas;
4. The fossils demonstrate unusual or spectacular circumstances in the history of life; or
5. The fossils are in short supply and/or in danger of being depleted or destroyed by the elements, vandalism, or commercial exploitation, and are not found in other geographic locations.

Paleontological resources occur in older soils which have been deposited in the valley over millions of years. The proposed project's potential to impact significant, nonrenewable paleontological resources appears to be low in the surface based on the alluvial soils onsite and the near-surface soils of Holocene age but high in the subsurface deposits of older Pleistocene alluvial sediments. The Riverside County General Plan EIR designates the City as a low sensitivity area for paleontological resources.

Seismic Hazards

Seismicity and Faulting

No active faults are known to project through the subject site. The site also does not lie within the boundaries of an "Earthquake Fault Zone" as defined by the State of California in the Alquist-Priolo Earthquake Fault Zoning Act, or within a Riverside County Fault Zone. The project site does, however, lie within 50 miles or less of several significant active and potentially active faults that are considered capable of generating strong ground motion at the subject site. These faults include various segments of the San Jacinto Fault and the San Andreas Fault. The San Andreas Fault is considered the dominant feature of the Colorado Desert Geomorphic Province (CDGP) and is known for its exposures and related fault systems forming the margin between the Pacific and North American Plates.

Faulting

According to the updated 2022 Palm Springs General Plan Safety Element, there are several active faults in the area. At least two active faults, the San Andreas and the Garnet Hills Faults extend through the northern portions of the City. Both fault zones, along with other faults in the greater region, such as the San Gorgonio Pass and the San Jacinto Faults, also have the potential to produce strong seismic shaking in Palm Springs. There are more than 10 branches of the San Andreas and San Jacinto Faults that are less than 25 miles away from the project site.

Below is a table of the closest known active faults to the project property as determined in the Geotechnical Investigation (**Appendix G**).

Table 4.6-1 Closest Known Active Faults

Fault Name	Distance (miles)*	Direction
San Andres Fault – Banning Branch	0.3	northeast
San Andres Fault – Garnet Hill	0.9	south-southwest
San Jacinto Fault – San Jacinto Valley	18.0	southwest

*Approximate distance from the project site.

Seismicity

Southern California is subject to seismic hazards of varying degrees depending on the proximity, degree of activity, and capability of nearby faults. These hazards can be primary or secondary. Primary hazards are directly related to the energy release of an earthquake (such as surface rupture and ground shaking), while secondary hazards relate to the effect of earthquake energy on the physical world (i.e., liquefaction or ground lurching).

Earthquakes release seismic energy that is measured in terms of intensity and magnitude. Several factors (including the earthquake's magnitude, distance from the epicenter, and soil and rock composition) determine the intensity of ground shaking. A variety of logarithmic scales have been used by seismologists to measure earthquakes. The most common measure of seismic intensity is the Modern Mercalli Intensity (MMI) scale, which measures damage from partial or total collapse of masonry structures to severe damage or devastation of underground infrastructure, bridges, overpasses, or other improvements. The Richter Scale measures earthquake magnitude as a function of amplitude of ground motion at distance from the epicenter, based on a scale from one to ten.

Rupture

Surface rupture occurs when movement on a fault breaks through to the surface. Fault rupture typically follows preexisting fault lines since they are zones of weakness. Rupture may occur suddenly during an earthquake or slowly in the form of fault creep. Sudden displacements are more damaging to structures because they are accompanied by shaking. However, not all earthquakes result in surface rupture.

Liquefaction

Liquefaction occurs when strong seismic shaking of saturated sand or silt causes intergranular fluid (pore-water) pressures to increase to levels where grain-to-grain contact is lost, and material temporarily behaves as a viscous fluid. Liquefaction can cause settlement of the ground surface, loss of bearing, settlement and tilting of structures, flotation and buoyancy of buried structures and fissuring of the ground surface. A common surface manifestation of liquefaction is the formation of sand boils – short-lived fountains of soil and water that emerge from fissures or vents and leave freshly deposited, usually conical mounds of sand or silt on the ground surface.

Landslides

As a result of seismic ground shaking, secondary effects such as slope failures, rockfalls and landslides may occur in the City, especially throughout elevated areas. According to the Palm Springs General Plan Safety Element, large landslide deposits are present in the San Jacinto and Santa Rosa Mountains; however, only one landslide deposit has been identified in the Palm Springs area. This landslide deposit is associated with the San Jacinto Mountain. The project property is approximately 3.4 miles north from the base of the San Jacinto Mountains.

Failed slopes also pose risks for potential landslides and other associated hazards, such as compressible soils. Failed slopes exist in the northwestern area of the City as a result of the 1986 North Palm Springs Earthquake. In addition, the foothills and mountains adjacent to Palm Springs have steep slopes susceptible to landslides and other slope failures in response to seismic shaking. Areas of high topographic relief, such as steep canyon walls, are most likely to be impacted by rockfalls, landslides, soil slips, and to a lesser degree, large landslides. Locations in the Garnet Hill and Edom Hill areas contain unstable soil types along which slope failures could occur. The base of Garnet Hill is approximately 0.75 miles southeast to the project site, and the base of Edom Hill is approximately 4.9 miles east to the project site. These areas would not affect the project site if slope failure occurred. The project site is surrounded by relatively flat land and is not at risk of landslides on or adjacent to the site.

Erosion

Climate, topography, soil and rock types, and vegetation are all factors that influence erosion, runoff, and sedimentation. According to the Palm Springs General Plan Safety Element, soil erosion typically results from concentrated runoff on unprotected slopes and from wind erosion occurring in flat, bare areas, dry sandy soils or anywhere sand is loose and finely granulated.

High wind areas in the central axis of the Coachella Valley, including areas one-mile north and south of the Interstate 10 Freeway, have a high susceptibility to wind erosion. The project site is within the one-mile buffer zone of the Coachella Valley Blowsand Zone according to *Flood & Blowsand Risk Assessment and Improvement Plan for Western Coachella Valley* prepared for Coachella Valley Association of Governments in 2020. Additionally, according to the General Plan's Air Quality Element Figure 7-1, *Blowsand Areas,* the project site occurs in an active blowsand hazard zone. To address erosion, Policy SA3.10 of the General Plan encourages the incorporation of wind barriers, architectural design or features, and drought-resistant ground coverage in new development site designs to mitigate the impacts from erosion and windblown sand.

Ground Subsidence

Ground subsidence is the gradual settling or sinking of the ground surface with little or no horizontal movement. It is caused by both human activities (i.e., groundwater extraction) and natural activities

(i.e., earthquakes) and can cause regional damage. According to the Palm Springs General Plan Safety Element, the Indio Subbasin of the Coachella Valley Groundwater Basin and the Mission Creek Subbasin are the subbasins existing below the City managed by various water service agencies in the region. The portion of the subbasin under the project is the Mission Creek Subbasin, and it is managed by the Mission Springs Water District (MSWD), Coachella Valley Water District (CVWD), and the Desert Water Agency (DWA). These three water districts are collectively the Mission Creek Subbasin Management Committee. Proper groundwater management should minimize subsidence throughout the City; however, more frequent drought conditions could lead to heavier reliance on groundwater which would increase the probability of ground subsidence.

Expansive Soils

Expansive soils, also referred as swelling soils, are soils that have a tendency to increase in volume with an increase in the moisture content. These soils swell when water is added to them and shrink when they dry out. Foundations with swelling soils will heave and can cause lifting of a building or structure when the moisture content rises. This can ultimately lead to the failure of foundations and structures.

Collapse

Soil collapse, also referred to as hydrocompaction, typically occurs in recently deposited sediments that accumulate in an arid or semi-arid environment. Sediments prone to collapse are commonly associated with alluvial fan and debris flow sediments deposited during flash floods. These deposits are typically dry and contain minute pores and voids. The soil particles may be partially supported by clay, silt, or carbonate bonds. When saturated, collapsible soils undergo a rearrangement of their grains and a loss of cementation, resulting in substantial and rapid settlement under relatively light loads. An increase in surface water infiltration, such as from irrigation or a rise in the groundwater table, combined with the weight of a building or structure, can initiate rapid settlement and cause foundations and walls to crack. Typically, differential settlement of structures occurs when landscaping is heavily irrigated near the structure's foundation.

Seiche and Tsunami

A seiche is defined as "an occasional and sudden oscillation of the closed water body (enclosed water body, lake, bay, estuary, etc.) producing fluctuations in the water level." There are many causes of seiches, for example, wind, earthquakes, and changes in barometric pressure. The seiche hazard in the valley includes above-ground water reservoirs, golf course lakes and other impoundments. Domestic water reservoirs in the valley have been constructed to resist the effects of ground shaking that could compromise the integrity of these structures.

4.6.3 Regulatory Setting

Federal

No federal regulations are associated with seismicity or soils.

State

Alquist-Priolo Earthquake Fault Zoning Act

The Alquist-Priolo Earthquake Fault Zoning Act was enacted in 1972 to prohibit the location of developments and structures for human occupancy across the trace of active faults. To assist with this, the State Geologist delineates appropriately wide earthquake fault zones (Alquist-Priolo Zones) to encompass potentially and recently active traces, which are submitted to city and county agencies to be incorporated into their land use planning and construction policies. A trace is a line on the earth's surface defining a fault, and an active fault is defined as one that has ruptured in the last 11,000 years. The minimum distance a structure for human occupancy can be placed from an active fault is generally fifty feet.

Seismic Hazard Mapping Act

The Seismic Hazards Mapping Act (SHMA) of 1990 directs the Department of Conservation, California Geological Survey to identify and map areas prone to earthquake hazards of liquefaction, earthquake-induced landslides and amplified ground shaking. The purpose of the SHMA is to reduce the threat to public safety and to minimize the loss of life and property by identifying and mitigating these seismic hazards.

The SHMA requires the State Geologist to establish regulatory zones (Zones of Required Investigation) and to issue appropriate maps (Seismic Hazard Zone Maps). These maps are distributed to all affected cities, counties, and state agencies for their use in planning and controlling construction and development.

California Code of Regulations, Title 24 (California Building Standard Code)

The California Building Standards Commission operates within the Department of General Services and is charged with the process of approving and adopting building standards for publication in the California Building Standards Code (Cal. Code Regs., Title 24). These regulations include provisions for site work, demolition, and construction, which include excavation and grading, as well as provisions for foundations, retaining walls, and expansive and compressible soils. The California Building Code (CBC) also provides guidelines for building design to protect occupants from seismic hazards.

The City of Palm Springs Building Department uses the most current CBC (2022) in the plan check process and in field inspections. The City's Building Department will use the latest CBC in effect at the time of application for building permits within the project site.

Regional and Local

South Coast Air Quality Management District

South Coast Air Quality Management District (SCAQMD) is the regulatory agency responsible for improving air quality for parts of southern California, including Orange County and portions of Los Angeles, San Bernardino, and Riverside counties, including the Coachella Valley. SCAQMD is responsible for controlling emissions primarily from stationary sources of air pollution, including grading and construction sites. The main source of pollution from grading and construction activities is fugitive dust, which is particulate matter that is suspended in the air by direct or indirect human activities and relates directly to soil erosion caused by wind. Two South Coast AQMD rules were adopted with the purpose of reducing the amount of fugitive dust entrained as a result of human activities. Rule 403 applies to any activity capable of generating fugitive dust. Rule 403.1 is supplemental to Rule 403 and applies only to fugitive dust sources in Coachella Valley.

Rule 403 – Fugitive Dust

Rule 403 requires the implementation of best available dust control measures (BACM) during active operations capable of generating fugitive dust. This rule also requires activities defined as "large operations" to notify the South Coast AQMD by submitting specific forms. A large operation is defined as any active operation on property containing 50 or more acres of disturbed surface area; or any earth moving operation with a daily earth-moving or throughput volume of 5,000 cubic yards, three times during the most recent 365-day period. The project would be subject to Rule 403.

Rule 403.1 – Supplemental Fugitive Dust Control Requirements for Coachella Valley Sources

Rule 403.1 is a supplemental rule to Rule 403 and is applicable to man-made sources of fugitive dust in the Coachella Valley. The purpose of this rule is to reduce fugitive dust and resulting PM_{10} emissions from man-made sources. Rule 403.1 requires a Fugitive Dust Control Plan approved by South Coast AQMD or an authorized local government agency prior to initiating any construction/earth-moving activity. These requirements are applicable to construction projects with 5,000 or more square feet of surface area disturbance. The project would be subject to Rule 403.1.

Palm Springs Municipal Code

Title 8 – Buildings and Construction

Building, construction, and grading activities for the project would be subject to Title 8 of the Palm Springs Municipal Code, which governs the conditions, construction, and maintenance of all property, buildings, and structures within the City. Title 8 is based on the most recent CBC, which sets minimum design and standards for construction of buildings and structures that must also meet minimum seismic design standards.

City of Palm Springs General Plan

Adopted in 2007, and updated in September 2022, the City of Palm Springs General Plan Safety Element assesses the physical characteristics of the planning area and the community's overall safety. This element relates to the need to protect the community from risks associated with a variety of hazards, including seismically induced hazards, such as surface rupture, ground shaking, ground failure, seiching, dam failure, subsidence, and other geologic risks.

The goals and policies addressed in the Safety Element that apply to the construction and implementation of the proposed project are:

Goal SA2: Minimized physical and environmental effects of seismic hazards in the city.

Policy SA2.1: Require geologic and geotechnical investigations in areas of potential seismic hazards such as fault rupture, seismic shaking, liquefaction, and slope failure, as part of the environmental and/or development review process for all structures and enforce structural setbacks from faults that are identified through those investigations in accordance with the Seismic Hazards Mapping Act. Require subsurface investigations of the Garnet Hill Fault if and as that area of northern Palm Springs is developed.

Policy SA2.3: Enforce the requirements of the California Seismic Hazards Mapping and Alquist-Priolo Earthquake Fault Zoning Acts when siting, evaluating, and constructing new projects within the city.

Goal SA3: A city protected, to the greatest extent possible, from geologic hazards.

Policy SA3.1: Minimize grading and other changes to the natural topography to protect public safety and reduce the potential for property damage as a result of geologic hazards.

Policy SA3.10: Encourage the incorporation of wind barriers, architectural design or features, and drought-resistant ground coverage in new development site designs to mitigate the impacts from erosion and windblown sand.

4.6.4 Project Impact Analysis

Thresholds of Significance

The following standards and criteria have been drawn from Appendix G: Environmental Checklist Form of the CEQA Guidelines. Development of the proposed project on the project site would have a significant effect on soils and geology if it is determined that the project will:

a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:
    ii. Strong seismic ground shaking?
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, creating substantial direct or indirect risks to life or property?

f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Methodology

A Geotechnical Investigation was prepared for the project site by Petra Geosciences, Inc. (Petra) in March 2023. The purposes of this investigation were to 1) obtain information regarding surface and subsurface geologic conditions within the area of the proposed construction, 2) evaluate the engineering properties of the onsite soil materials, and 3) provide conclusions and recommendations for design and construction of the proposed improvements.

Based on the results of the initial field and laboratory testing, Petra performed additional field and laboratory testing to evaluate on-site soil for potential for hydro-collapse. Information obtained has been incorporated into the revised report contained in **Appendix G.**

Investigation reports conducted at the neighboring Coachillin project site, located immediate east of Indian Canyon Drive, were also used to reflect the geotechnical conditions of the project property. The main difference between the Coachillin project site and the subject property is that an active fault zone traverses the northeastern corner of the Coachillin site, unlike the project site where there are no zones of active faulting.

Additional conclusions and determinations provided in this Geology and Soils section were derived from State resources and public agency (County and City) documentation. Agency maps illustrating regional and local fault lines and zones, susceptibility to liquefaction, areas susceptible to rockfalls and landslides, and areas of paleontological sensitivity were consulted to analyze the potential impacts of geology and soils present at the project site.

Project Impacts

a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

ii. Strong seismic ground shaking

Regional faults, including the San Andreas and San Jacinto faults, have the potential to generate strong ground shaking in the Palm Springs area. The project site is located approximately 0.3 miles south of the San Andreas Fault, Banning Branch. The Geotechnical Investigation found that due to the nature of the soils on the project site and to the multiple active faults in the project's vicinity, the site has been subjected to past ground shaking, and seismic shaking is expected during the design life of the proposed project. Additionally, according to the City's General Plan Safety Element, Garnet Hill and Banning Fault branches have a relatively high probability of generating an earthquake in the next 30 years. Therefore, it is expected that the project site will experience seismic ground shaking in the future. Structures on the site and offsite improvements will be designed and constructed to resist the effects of strong ground motion in accordance with the 2022 California Building Code (2022 CBC). **Mitigation Measure GEO-1** requires that the project comply with all the grading and excavation codes and be in compliance with all applicable provisions of the 2022 CBC. Compliance with the 2022 CBC would ensure exterior and interior components of the building, like high-staking shelving, would be secure during an earthquake. The proposed development would be constructed in a manner that reduces the risk of seismic hazards consistent with Title 24, California Code of Regulations. Site work would be conducted in accordance with the project-specific geotechnical and soils analyses required with the submittal of grading and building plans. Foundation and structural design of the proposed project would reduce exposure of people or structures to adverse effects to the greatest extent possible with implementation of the recommendations from the project's Geotechnical Investigation.

Offsite improvements include connection to MSWD's sewer line and water line. Offsite construction would follow MSWD's standard requirements and the most recent CBC standards during construction to ensure impact due to ground shaking would be less than significant.

In order to assure that the project is not significantly impacted by ground shaking, the following mitigation measures have been derived from the Geotechnical Investigation:

Mitigation Measure GEO-2 requires clearing operations to include the removal of any trash, debris, vegetation, and similar deleterious materials including the root balls of any trees. Voids created by these removals shall be backfilled. The removal and replacement of surficial artificial and compressible soil materials with engineered fill is also required. Any buried deleterious materials encountered within the site due to past site usage may need to be removed by hand (i.e., root pickers) during grading operations. **Mitigation Measure GEO-2** would create an evenly compacted and level surface for construction.

Mitigation Measure GEO-3 requires the removal of existing undocumented fill and near surface native soils that are considered unsuitable for support of proposed structures. Unsuitable soils shall be removed to underlying competent alluvial materials. The estimated depth of removal is recommended to be approximately 6 feet below the existing ground surface in proposed building areas. The actual depths and horizontal limits of removals and over-excavations would be determined with review of the final site grading plan and during grading on the basis of observations and testing performed by the project geotechnical consultant. Excavated soils, if free of deleterious materials, are considered acceptable for use as compacted fill. **Mitigation Measure GEO-3** improves soil composition by creating even and uniform conditions for construction. Additionally, prior to placing engineered fill, measures must be undertaken, including the scarification of the exposed subsoil surfaces within the designated areas where soil would be removed, to a minimum depth of 12 inches. Subsequently, the scarified surfaces shall be subject to a moisture-conditioning or air-drying process to achieve a moisture content approximately two percent above optimum levels. The surface shall then be compacted with heavy construction equipment prior to the placement of fill. The uppermost 12 inches of the removed subsoil shall meet or exceed 90 percent relative compaction.

Furthermore, all fill materials shall be placed in incremental layers, each measuring approximately 6- to 8-inches in thickness. Before placement, similar to the scarified surfaces discussed above, the fill materials must be watered or air-dried as necessary to achieve a minimum moisture content of at least 2 percent above the optimum moisture condition, and then compacted in-place to a minimum relative compaction of 90 percent. These requirements are further explained in **Mitigation Measure GEO-4** through **GEO-6.** These procedures are required to ensure the structural integrity of the site, rendering it capable of accommodating the proposed construction in a secure and stable manner, thus reducing impacts to less than significant levels.

A geotechnical consultant shall be present onsite during all earthwork operations to document placement and compaction of fills, as well as to document compliance with the other recommendations presented herein as stated in **Mitigation Measure GEO-7**.

Mitigation Measure GEO-8 requires standards for footings throughout the project to ensure that the weight of the project is equally distributed across the entire structure, ensuring the project does not sink or become unstable due to the quality of the soil on the project site. **Mitigation Measure GEO-9** requires standards for floor slabs throughout the project to ensure that the building is properly stabilized and can properly support the load of the walls, beams, and foundations.

As discussed above, the project shall also comply with the most current seismic design coefficients and ground motion parameters and all applicable provisions of the 2022 CBC, specifically Chapter 16 of the CBC, *Structural Design,* Section 1613, *Earthquake Loads*, as well as Title 8, *Buildings and Construction*, of the City Municipal Code as required in **Mitigation Measure GEO-1.**

With the implementation of **Mitigation Measures GEO-1** through **GEO-9**, the risk of adverse effects to the proposed project and offsite construction relating to the project from strong seismic ground motion would be less than significant.

b. Result in substantial soil erosion or loss of top soil

According to the Palm Springs General Plan, the severity of soil erosion and loss of top soil is determined by the climate, topography, soil and rock types, and vegetation or lack thereof. Natural erosion processes are often accelerated through human activities—agricultural or related to land development. Grading increases the potential for erosion and sedimentation by removing protective vegetation, altering natural drainage patterns, compacting the soil, and constructing cut-and-fill slopes, which may be more susceptible to erosion than the natural condition.

Soil erosion at the project site can be caused by windborne, waterborne, and human-related activities, including project construction and operation as discussed below.

Windborne Erosion

Construction of this project would involve ground disturbing activities, such as the clearing and grubbing of existing vegetation, and grading of the entire 38 acres. Offsite improvements include connection to MSWD sewer line and water line. These activities would increase the potential of soil erosion at the time of development. In order to reduce the effect of windborne erosion at the project site and at the offsite construction location, the project shall be required to implement the Coachella Valley PM10 State Implementation Plan (PM10 Plan) requirement for a Fugitive Dust Control Plan. A Fugitive Dust Control Plan is required under Palm Springs Municipal Code Section 8.50.022 for any area of more than five thousand square feet. The Fugitive Dust Control Plan requires the implementation of best available control measures (BACMs) such as the use of perimeter fencing, applying adhesive dust suppressant, or watering the project site. The project property shall implement the BACMs for on- and off-site improvements detailed within the project-specific Fugitive Dust Control Plan during construction of the project site. Refer to **Section 4.2, *Air Quality***, of this environmental document for further information on the Fugitive Dust Control Plan.

Waterborne Erosion

Erosion from rainfall and runoff at the project site during grubbing, grading and construction activities would have adverse effects if not addressed. Therefore, in conjunction with the requirements for water protection detailed in **Section 4.9, *Hydrology and Water Quality***, and prior to site disturbance, the project contractor would be required to apply to the State Water Resources Control Board (SWRCB) for coverage under the Construction General Permit (Order No. 99-08-DWQ) (CAS000002). This requirement applies best management practices to remove eroded soils from stormwater discharges during clearing, grading, and excavation. The Construction General Permit requires an

applicant to prepare and implement a Storm Water Pollution Prevention Plan (SWPPP). The SWPPP includes a list of the best management practices (BMPs) that would be implemented to prevent soil erosion that could contaminate nearby water resources. The SWPPP for the proposed project and offsite construction relating to the project would be prepared in conjunction with the final grading permit, and would require a range of BMPs, including:

- *Temporary Soil Stabilization:* hydraulic mulch, soil polymers and geotextiles;
- *Temporary Sediment Control:* sandbag barriers, straw bale barriers, sediment traps, and fiber rolls.
- *Wind Erosion Control: wind fencing,* water of the construction site, straw mulch;
- *Tracking Control:* staging/storage area, track-out plates and street sweeping;
- *Non-stormwater Management:* clear water diversion and dewatering; and
- *Waste Management and Materials Pollution Control:* vehicle and equipment cleaning, concrete waste management, and contaminated soils management.

Therefore, the implementation of a SWPPP for the project site would reduce soil erosion or the loss of topsoil during construction resulting from stormwater to less than significant levels. This issue is discussed further in **Section 4.9, *Hydrology and Water Quality,*** of this Draft EIR.

When completed, the project would include landscaping, an approximately 739,360-square-foot building, and paved areas throughout the property. Landscaped areas would include ground coverings, trees, and shrubs that would stabilize the ground surface. Irrigation systems (i.e., sprinklers or drip irrigation) would also be maintained according to City standards during project operation to ensure that overwatering of plants (which leads to waterborne erosion) does not occur. Drainage and retention facilities would be maintained according to City standards during project operation to ensure their intended function. The required routine maintenance of the onsite drainage and retention facilities as detailed in the approved Water Quality Management Plan (see **Section 4.9, *Hydrology and Water Quality***) and associated infrastructure would reduce the likelihood of flooding on the property. Additionally, the project would introduce impervious, paved areas throughout the property. The impervious surfaces would reduce the potential for erosion during operation by stabilizing the ground surface and minimizing the amount of exposed soil. These features would establish stabilized surfaces and onsite maintenance at the project site, thereby decreasing the likelihood of onsite windborne and waterborne erosion during project operation. Site drainage standards are described in **Mitigation Measure GEO-10**. The implementation of the Fugitive Dust Control Plan (**Section 4.2, *Air Quality***) and the SWPPP (**Section 4.9, *Hydrology and Water Quality***), as well as **Mitigation Measures GEO-10** would ensure that impacts from erosion created from the project site and any offsite construction relating to the project would be less than significant.

c. *Located on geologic unit that is unstable, or become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse*

It was concluded during the field investigation of the project property that there is a low risk for landsliding, lateral spreading, subsidence, liquefaction, or collapse because of the gentle slope site conditions. The site contains near-surface compressible native soils with underlying fill soils consisting of topsoil, colluvium, and alluvium. **Mitigation Measure GEO-2** addresses the backfill of voids created from the removal of root balls from any trees on site and the placement of engineered fill. **Mitigation Measure GEO-3** discusses the requirements for soil removal. **Mitigation Measure GEO-4** addresses the requirement of a geotechnical consultant to approve the exposed bottom surfaces in the soil removal areas. **Mitigation Measure GEO-5** addresses the requirements set forth for remedial grading. **Mitigation Measure GEO-6** discusses fill materials and the requirement to be in accordance with ASTM D 1557. **Mitigation Measure GEO-8** requires standards for footings throughout the project and **Mitigation Measure GEO-9** requires standards for floor slabs throughout the project, both ensuring that the project is level, won't settle, and can withstand the weight of the walls, foundations, and beams throughout the project.

Mitigation Measure GEO-2 through **GEO-9** address requirements for the project's construction that ensure stable structures. The overall density of the alluvial soils encountered in borings on the project site (medium dense to dense) is at a reduced risk of subsidence because they are dense and consolidated, and as a result less subject to subsidence. According to the Geotechnical Investigation, an average shrinkage factor estimated at 14 to 20 percent is anticipated when excavated on-site soils are replaced as properly compacted fill. Subsidence, estimated at 0.15 to 0.25 feet may also occur when exposed bottom surfaces in removal areas are scarified and re-compacted as recommended in **Mitigation Measure GEO-4**. Anticipated shrinkage and subsidence from compacted fill are addressed in **Mitigation Measure GEO-9** which specifies the thickness and reinforcement requirements for concrete floor slabs in different areas, such as warehouses. It also outlines the need for moisture vapor retarders, soil conditioning, and flexibility for adjustments by the structural engineer based on calculations and expertise. With the implementation of **Mitigation Measure GEO-2** through **GEO-9,** the risks associated with subsidence for the construction of the project site and offsite construction relating to the project would be less than significant.

Liquefaction

Liquefaction occurs when ground shaking of relatively long duration and intensity causes loose, unconsolidated soils to act like a liquid and lose strength.

As described in the Geotechnical Investigation, no groundwater was encountered to a maximum depth of 66 feet below ground surface during the subsurface exploration of this site. The consulting geologist concluded that based on the historical groundwater depths in the vicinity exceeding 200

feet below the ground surface, and the medium dense to dense nature of the unconsolidated young alluvial fan materials encountered at depth during previous field exploration, hazards associated with liquefaction, and subsequent effects (i.e., lateral spread), are considered low. Therefore, impacts to the project relating to liquefaction will be less than significant.

Landslides and Rockfalls

The project site and surrounding area is defined by relatively flat land. The project property is not situated in close proximity to the local mountain ranges, therefore, landslides or rockfalls associated with these mountains would not occur at the project site. According to Figure 6-4, *Landslide Susceptibility*, of the Palm Springs General Plan, the closest slope to the project site is Garnet Hill, located on the other side of the Interstate 10 Freeway, 0.7 miles southeast. Based on the map, landslide debris from Garnet Hill would not reach the site. Additionally, the Geotechnical Investigation indicated no signs of slope instability in the vicinity and no potential for landslides, rockfalls, earthflows, or slumps were observed at or near the subject site. Therefore, risks associated with slope instability should be considered negligible. Impacts would be less than significant.

Ground Subsidence

Excessive groundwater withdrawal typically results in subsidence. According to the project-specific Geotechnical Investigation, aerial photographs of the project area and immediate vicinity indicate no readily discernable features, such as ground fissures, linearity of depressions, radial directed drainages, etc., which would indicate subsidence or hydro-consolidation is occurring at this time. Due to the absence of a clay layer in the groundwater basin hydrogeology, land subsidence is less likely to occur in regions overlying the Garnet Hill and Mission Creek subbasins. Therefore, the potential for subsidence to affect the project is considered low and would generally be no greater than that for existing development in the immediate site vicinity.

Based on a review of the Riverside County Land Information System website, the project site is situated in an area susceptible to ground subsidence due to the withdrawal of groundwater. The United Stated Geological Survey (USGS), with CVWD, completed subsidence monitoring reports for the Coachella Valley in 2001 and 2007. Monitoring conducted by the USGS and CVWD shows that subsidence rates in the Coachella Valley have been increasing rapidly over the past several decades, especially during periods of overdraft of the basins.

According to the 2020 Coachella Valley Regional Urban Water Management Plan (RUWMP), to address groundwater overdraft, CVWD and the DWA began recharge operations at the Mission Creek Groundwater Replenishment Facility (MC-GRF) in 2002. In addition, CVWD, DWA, and MSWD completed and adopted the 2013 Mission Creek/Garnet Hill Water Management Plan to address groundwater overdraft and the agencies (collectively the Management Committee) are implementing that plan. Projects constructed as part of the plan in the past eight years include septic to sewer

conversion projects, abating approximately 3,400 septic tanks, and installation of additional monitoring wells. In addition, MSWD began construction of its additional Regional Water Reclamation Facility in 2022 to provide the treatment capacity needed to complete removal of all legacy septic tank systems throughout its service area. Additional programs focusing on conversion of groundwater pumpers to recycled and imported Coachella Canal water over the next ten years are intended to prevent future overdraft. Furthermore, MSWD conservation measures for customers include water waste prevention ordinances, metering, conservation pricing, public outreach and education, and other management measures like rebate programs.

The MSWD prepared a Recycled Water Program Development Feasibility Study in 2018 in which treatment and distribution alternatives and recycled water demands were identified. It was determined that recycled water infrastructure could feasibly be implemented for groundwater recharge, and, subsequently, to supply existing and future irrigation demands and offset a portion of potable water demands. Recycled water can be used for groundwater basin replenishment and favorably impacts water balance calculations. When this is achieved, the risk of subsidence is reduced or eliminated. The strategies evaluated for the 2020 Coachella Valley RUWMP achieve a reasonable balance between the benefits of overdraft reduction, water level increases and impacts resulting from those increases. (See **Section 4.9, *Hydrology and Water Quality***, and **Section 4.15**, ***Utilities and Service Systems,*** of this Draft EIR). Implementation of these strategies would regionally reduce subsidence impacts over the long term.

Collapse

Soil collapse occurs in recently deposited sediments that accumulate in an arid or semi-arid environment. A regional geologic map of the Palm Springs Quadrangle indicates that Holocene to Late Pleistocene young alluvial fan deposits are mapped underlying the subject property. These deposits are described as unconsolidated to slightly consolidated, undissected to slightly dissected boulder, cobble, gravel, sand, and silt deposits issued from a confining valley or canyon.

According to the Geotechnical Investigation, the project site is underlain with undocumented, artificial fill and compressible soils. Such materials consist of surficial topsoil/colluvium/alluvium and are not considered suitable for support of fill or structural loads in their current state. Accordingly, these materials would require removal to competent alluvial deposit soils and replacement with properly compacted fill. The project is required to remove debris, vegetation, undocumented fill soil, and loose soil from the existing soil, and compact the soil using controlled compacted fill, and additional mitigations regarding soil and foundational conditions are included as **Mitigation Measures GEO-1** through **GEO-9.** Offsite improvements include connection to MSWD sewer line and water line. Offsite improvements would have less than significant impact regarding geologic stability because construction of the proposed project would follow the most recent MSWD standards and

requirements, and CBC regulations. Additionally, the implementation of the mitigation measures would assure that impacts associated with soil collapse remain less than significant.

Conclusion

Grading plans and structural engineering plans would be reviewed and approved by the City. The project will be conditioned to comply with the current CBC standards, City requirements, and recommendations within the project-specific Geotechnical Investigation to reduce the impacts of potentially unstable soils. The implementation of **Mitigation Measure GEO-1** through **GEO-10** prior to and during project grading and project construction on-site and offsite would ensure that foundation bearing conditions are firm and uniform, therefore, reducing impacts of geological hazards to less than significant levels.

d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code, creating substantial direct or indirect risks to life or property

Expansive soils contain a significant amount of clay particles which can give up water (shrink) or take on water (swell). The change in volume exerts stress on buildings and other loads placed on these soils, making them potentially hazardous. These soils can be widely dispersed, occurring in both hillside areas and low-lying alluvial basins.

Based on available data referred to in the Geotechnical Investigation, including the non-plastic, granular nature of the soils encountered in the subsurface exploration, near surface soils are considered very low in expansion potential (Expansion Index less than 20). **Mitigation Measure GEO-11** requires all imported soil to exhibit very low expansion potential. Imported soils shall be observed at the source, tested, and approved by a geotechnical consultant prior to importing the soils to the site. Additional sampling and testing shall be performed during site grading for determining actual expansion potential of the supporting building pad soils.

Per the Geotechnical Investigation, recommendations regarding foundation design, such as the removal and re-compaction of any loose soil, shall be carried out through construction. If imported fill is required, the material shall be of a non-expansive nature and shall meet the criteria outlined within the Geotechnical Investigation. The project and offsite construction for the project shall comply with the recommendations established within the project-specific Geotechnical Investigation to ensure the foundational safety of the project site. The recommendations established in the Geotechnical Investigation are contained in **Mitigation Measure GEO-1** through **GEO-11**. With the implementation of the proposed mitigation measures, the impact would be less than significant.

f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature

The Riverside County General Plan EIR designates the City as a low sensitivity area for paleontological resources. The "low potential" category classifies lands for which previous field surveys and documentation have found a low potential for containing significant paleontological resources. The project site primarily consists of alluvial sands, which are recent deposits and not conducive to the preservation of paleontological resources. However, deeper Pleistocene-age sediments and formations have a higher potential for the presence of fossils.

If grading plans require that project related excavations go deeper than ten feet, Pleistocene- age soils could occur, and paleontological resources could be uncovered. This would represent a potentially significant impact. **Mitigation Measure GEO-12** requires a qualified paleontological monitor to be present if excavations go deeper than ten feet to check for fossils. If paleontological resources are discovered, construction shall be halted in the area and moved to other parts of the project site while the monitor determines the significance of these resources. The paleontologist shall have authority to divert grading away from exposed fossils temporarily in order to recover the fossil specimens. If the find is determined to be significant, avoidance or other appropriate measures shall be implemented as recommended by the monitor.

Additionally, **Mitigation Measure GEO- 13** requires that all fossils and associated data recovered during the paleontological monitoring shall be reposted in a public museum or other approved curation facility. Implementation of **Mitigation Measure GEO-12** and **GEO-13** would reduce impacts to paleontological resources to less than significant levels.

4.6.6 Cumulative Impacts

Potential cumulative impacts on geology and soils could result from projects that combine to create geologic hazards, including unstable geologic conditions. Although most geology and soil hazards associated with development projects in the surrounding area would be site specific, cumulative growth in the project area would expose a greater number of people to geologic hazards. Due to the localized nature of geology and soils, cumulative projects would address potential impacts on a project-by-project basis, as potential geologic hazards and soil composition varies by site.

As discussed above, any potential site-specific impacts can be mitigated to a less than significant level. Mitigation measures in the form of CBC compliance and recommendations outlined in the project-specific Geotechnical Investigation during the grading and construction address geotechnical hazards associated with seismic ground shaking, ground failure, liquefaction, subsidence, loss of topsoil, and expansive or corrosive soils. **Mitigation Measure GEO-1** through **GEO-11** would ensure that the project adheres to the recommendations provided in the project-specific Geotechnical Investigation. As a part of the approval process within the City of Palm Springs and surrounding area, other projects would be required to undergo similar geotechnical review and investigation to ensure that the respective project would not result in geotechnical hazards associated with seismic ground shaking, ground failure, liquefaction, subsidence, loss of top soil, and expansive or corrosive soils. Mitigation

measures would be applied as future projects are proposed surrounding the project site, and the project design and construction of habitable structures must be per the recommendations of each project's Geotechnical Investigation Report as well as the latest UBC and CBC as required by the City Engineer.

Buildout of the General Plan area has the potential to cumulatively impact paleontological resources. Development within the project site would be required to implement **Mitigation Measures GEO-12** and **GEO-13** to reduce potential impact to less than significant levels. Development of other projects within the City would also have the potential to result in impacts to paleontological resources. Future projects will be subject to the same standard requirements, mitigation measures (as applicable), and compliance with federal and State law as the proposed project to assure that impacts are reduced. Overall, the proposed project and cumulative projects would not result in significant cumulative impacts.

4.6.6 Mitigation Measures

GEO-1 The project shall comply with all the grading and excavation codes of the County of Riverside and shall be in compliance with all applicable provisions of the 2022 California Building Code (2022 CBC). The project shall also be in accordance with the project-specific Geotechnical Investigation for the submittal of grading and building plans.

GEO-2 Clearing operations shall include the removal of any trash, debris, vegetation, and similar deleterious materials including the root balls of any trees. Voids created by the removal shall be backfilled as well as the removal and replacement of surficial artificial and compressible soil materials with engineered fill. Any buried deleterious materials encountered within the site due to past site usage may need to be removed by hand (e.g., root pickers) during grading operations.

GEO-3 Any existing undocumented fill and near surface native soils are considered unsuitable for support of proposed structures and shall be removed to underlying competent alluvial materials as approved by the project geotechnical consultant. The estimated depth of removal is recommended to be approximately 6 feet below the existing ground surface in proposed building areas. Consideration shall be given to locally deepening the excavation at the location of tree roots or proposed subterranean features (if any) in order to provide a uniform depth of compacted fill in all areas. Soil removals could be locally deeper depending upon the actual exposed conditions encountered during grading. At a minimum, the over-excavation shall extend a distance beyond the perimeter of the structure equal to the depth of the over-excavation. The actual depths and horizontal limits of removals and over-excavations shall be evaluated upon availability of the site grading plan and during grading on the basis of observations and testing performed by the project geotechnical

consultant. Excavated soils, if free of deleterious materials, are considered acceptable for use as compacted fill.

GEO-4 Prior to placing engineered fill, the exposed bottom surfaces in the removal areas shall be approved by a representative of project geotechnical consultant. The exposed bottom(s) shall be scarified to a minimum depth of 12 inches, moisture-conditioned or air-dried to achieve approximately two percent above optimum moisture content and then compacted with a heavy construction equipment prior to placement of fill. Minimum compaction of the upper 12 inches of the removal bottom shall meet or exceed 90 percent relative compaction. The laboratory maximum dry density, the standard for determining relative compaction, and optimum moisture content for each change in soil type shall be determined in accordance with Test Method ASTM D 1557.

GEO-5 If remedial grading is necessary immediately adjacent to the property boundaries, a geotechnical consultant must prepare a plan addressing issues including: temporary backcut slopes shall generally be restricted to a slope ratio of 1:1 (h:v) or flatter to protect adjacent offsite improvements (including pavement, sidewalks, walls, buried utilities, etc.). Depending on the actual horizontal extent of necessary remedial grading, a wedge of unsuitable soil may remain in place along the site perimeter that will extend into the site. Any new perimeter site improvements that are anticipated to be within this zone may need to be designed and constructed with deepened and/or strengthened foundation systems designed to withstand relative movement that is likely to result from settlement of these likely compressible surficial soils. Alternately, the remedial grading adjacent to the site boundaries may be accomplished by the slot-cutting method. More specific recommendations may be appropriate once the rough grading plan is available for review.

GEO-6 All fill materials shall be placed in approximately 6- to 8-inch-thick loose lifts, watered or air-dried as necessary to achieve a minimum moisture content at least 2 percent above the optimum moisture condition, and then compacted in-place to a minimum relative compaction of 90 percent. The laboratory maximum dry density and optimum moisture content for each change in soil type shall be determined in accordance with ASTM D 1557.

GEO-7 Prior to the start of earthwork, a meeting shall be held at the site with the owner's representative, contractor, and geotechnical consultant to discuss the work schedule and geotechnical aspects of the grading. Earthwork, which in this instance will generally entail removal and re-compaction of the near surface soils, shall be accomplished under full-time observation and testing by the geotechnical consultant. A representative of the project geotechnical consultant shall be present onsite during all earthwork operations to document placement and compaction of fills, as well as to document compliance with the other recommendations presented herein. Additionally, the project geotechnical consultant shall provide observation and testing services based on scheduling determined

during the pre-earthwork meeting during final clearing and grubbing operations to document compliance with the above recommendations. In addition, shall unusual or adverse soil conditions or buried structures be encountered during grading that are not described herein, these conditions shall be brought to the immediate attention of the project geotechnical consultant for corrective recommendations.

GEO-8 Footings:

a) Exterior continuous footings supporting one- and two-story light-weight construction shall be founded at a minimum depth of 15 inches below the lowest adjacent final grade. For concrete tilt up structures, continuous footings shall be founded at a minimum depth of 24 inches. Interior continuous footings may be founded at a minimum depth of 12 inches below the top of the adjacent finish floor slabs.

b) In accordance with Table 1809.7 of 2022 CBC, all continuous footings shall have minimum widths of 12 inches for one- and two-story construction. Petra recommends all continuous footings shall be reinforced with a minimum of two No. 4 bars, one top and one bottom.

c) A minimum 12-inch-wide grade beam founded at the same depth as adjacent footings shall be provided across openings such as large doors or bay windows. The grade beam shall be reinforced in a similar manner as provided above.

d) Interior isolated pad footings, if required, shall be a minimum of 24 inches square and founded at a minimum depth of 12 inches below the bottoms of the adjacent floor slabs. Pad footings shall be reinforced with No. 4 bars spaced a maximum of 18 inches on centers, both ways, placed near the bottoms of the footings.

e) Exterior isolated pad footings intended for support of roof overhangs such as patio covers and similar construction shall be a minimum of 24 inches square, and founded at a minimum depth of 18 inches below the lowest adjacent final grade. The pad footings shall be reinforced with No. 4 bars spaced a maximum of 18 inches on centers, both ways, placed near the bottoms of the footings. Exterior isolated pad footings may need to be connected to adjacent pad and/or continuous footings via tie beams at the discretion of the project structural engineer.

f) The minimum footing dimensions and reinforcement recommended herein may be modified (increased or decreased subject to the constraints of Chapter 18 of the 2022 CBC) by the structural engineer responsible for foundation design based on calculations, engineering experience, and judgment.

GEO-9 Building Floor Slabs:

a) For office areas, and areas with light floor loading, concrete floor slabs shall be a minimum 4 inches thick and reinforced with a minimum No. 3 bars spaced a maximum of 18 inches on centers, both ways. For warehouse floors the slabs shall be a minimum of 5 inches thick and reinforced with a minimum No. 4 bars spaced a maximum of 18 inches on centers, both ways. All slab reinforcement shall be supported on concrete chairs or brick to ensure the desired placement near mid-depth.

b) Slab dimension, reinforcement type, size and spacing need to account for internal concrete forces (e.g., thermal, shrinkage and expansion) as well as external forces (e.g., applied loads), as deemed necessary.

c) Moisture sensitive concrete floor slabs and areas to receive moisture sensitive floor covering shall be underlain with a moisture vapor retarder consisting of a minimum 10-mil-thick polyethylene or polyolefin membrane that meets the minimum requirements of ASTM E96 and ASTM E1745 for vapor retarders (such as Husky Yellow Guard®, Stego® Wrap, or equivalent). All laps within the membrane shall be sealed, and at least 2 inches of clean sand shall be placed over the membrane to promote uniform curing of the concrete. To reduce the potential for punctures, the membrane shall be placed on a pad surface that has been graded smooth without any sharp protrusions. If a smooth surface cannot be achieved by grading, consideration shall be given to lowering the pad finished grade an additional inch and then placing a 1-inch-thick leveling course of sand across the pad surface prior to the placement of the membrane.

d) Prior to placing concrete, the subgrade soils below building and auxiliary area floor slabs shall be moisture conditioned to achieve a moisture content that is at least 1.2 times the optimum moisture content. This moisture shall penetrate to a depth of approximately 12 inches into the subgrade.

e) The modulus of subgrade reaction for design of load bearing elements depends on the size of the element and soil-structure interaction. As a first level of approximation, a modulus of subgrade reaction of 125 pounds per cubic inch may be assumed for floor slab design.

f) The minimum dimensions and reinforcement recommended herein for building floor slabs may be modified (increased or decreased) by the structural engineer responsible for foundation design based on calculations, engineering experience, and judgment.

GEO-10 Positive surface drainage systems consisting of a combination of sloped concrete flatwork/asphalt pavement, sheet flow gradients, swales, and surface area drains (where needed) shall be provided around the building and within any planter areas to collect and direct all surface waters to an appropriate drainage facility as determined by the project civil engineer. The ground surfaces of planter and landscape areas that are located within

10 feet of building foundations shall be sloped at a minimum gradient of 5 percent away from the foundations and towards the nearest area drains. The ground surface of planter and landscape areas that are located more than 10 feet away from building foundations may be sloped at a minimum gradient of 2 percent away from the foundations and towards the nearest area drains.

Concrete flatwork surfaces that are located within 10 feet of building foundations shall be inclined at a minimum gradient of one percent away from the building foundations and towards the nearest area drains. Concrete flatwork surfaces that are located more than 10 feet away from building foundations may be sloped at a minimum gradient of 1 percent towards the nearest area drains. Surface waters shall not be allowed to collect or pond against building foundations and within the level areas of the site. All drainage devices shall be properly maintained throughout the lifetime of the development. Future changes to site improvements, or planting and watering practices, shall not be allowed to cause over-saturation of site soils adjacent to the structures.

GEO-11 If imported soils are required to complete the planned grading, these soils shall consist of clean materials devoid of rock exceeding a maximum dimension of 4 inches, organics, trash, and other deleterious materials. To avoid making revisions to the foundation design, imported soils shall also be granular and exhibit a very low expansion potential (Expansion Index 0-20). Prospective import soils shall be observed at the source, tested and approved by the geotechnical consultant prior to importing the soils to the site. It is recommended that the project environmental consultant shall also be notified so that they can confirm the suitability of the proposed import material from an environmental standpoint. Additional sampling and testing shall be performed during site grading for determining actual expansion potential of the supporting building pad soils.

GEO-12 If grading plans show that project related excavations go deeper than ten (10) feet, a qualified paleontological monitor shall be retained by the site developer(s) to check for fossils. Should construction/development activities uncover paleontological resources, work will be halted in that area and moved to other parts of the project site and the monitor shall determine the significance of these resources. The paleontologist shall have authority to divert grading away from exposed fossils temporarily in order to recover the fossil specimens. If the find is determined to be significant, avoidance or other appropriate measures shall be implemented as recommended by the monitor.

GEO-13 All fossils and associated data recovered during the paleontological monitoring shall be reposted in a public museum or other approved curation facility based upon the specific resource recovered and recommendations from the paleontological consultant

4.6.7 Level of Significance After Mitigation

With implementation of **Mitigation Measures GEO-1** through **GEO-13** impacts associated with geologic hazards would be reduced to less than significant levels.

4.6.8 References

1. 2020 Coachella Valley Regional Urban Water Management Plan, https://wuedata.water.ca.gov/public/uwmp_attachments/2317090690/Coachella%20Valley%20RUWMP.pdf
2. Areas of Land Subsidence in California Map, United States Geological Survey (USGS), https://ca.water.usgs.gov/land_subsidence/california-subsidence-areas.html
3. ASTM International, Standard Test Method for Expansion Index of Soils https://www.astm.org/d4829-21.html
4. California Department of Conservation EQ Zapp: California Earthquake Hazards Zone Application.
5. City of Palm Springs General Plan Chapter 6, Safety Element, March 2007, revised September 2022https://www.psgeneralplan.com/_files/ugd/89af76_7fde384142cd41a8af4387814eb50e70.pdf
6. County of Riverside Environmental Impact Report No. 521, Cultural and Paleontological Resources (Section 4.9), County of Riverside, 2015, https://planning.rctlma.org/Portals/14/genplan/general_plan_2015/DEIR%20521/DEIR%20No.%20521.pdf
7. Mission Creek/Garnet Hill Water Management Plan Final Report January 2013, https://www.cvwd.org/Archive/ViewFile/Item/320
8. Revised Design Phase Geotechnical Investigation Report Proposed Industrial Building Development, Appropriate 38-Acre Site Northwest Corner of 19th Avenue and North Indian Canyon Drive Assessor Parcel Number (APN) 666-320-018 Palm Springs, Riverside County, California, Petra Geosciences inc., March 2023
9. Flood and Blowsand Risk Assessment and Improvement Plan for Western Coachella Valley Prepared for: Coachella Valley Association of Governments, Michael Baker International, 2020.
10. Riverside County Land Information System, https://rcitgis-countyofriverside.hub.arcgis.com/
11. United States Department of Agriculture Web Soil Survey, https://websoilsurvey.nrcs.usda.gov/app/WebSoilSurvey.aspx
12. Recycled Water Program Development Feasibility Study Regional Report, 2018 https://www.mswd.org/media/381

4.7 Greenhouse Gas Emissions

4.7.1 Introduction

The purpose of this section is to analyze the potential impacts of greenhouse gas (GHG) emissions, resulting from construction and operation of the project. The GHG contributors, their descriptions and supporting analyses are based in part on the following: Federal *Clean Air Act* (CAA); *2022 Air Quality Management Plan* (AQMP), by South Coast Air Quality Management District (SCAQMD); sections of the SCAQMD Rule Book; and *California Greenhouse Gas Emissions for 2000 to 2019, Trends of Emissions and Other Indicators*, 2021 Edition, California Air Resources Board; and Releases No. 18-37 & 19-35, California Air Resources Board (CARB) Press Release, July 2018 and August 2019.

At the project-specific level, the analytical and quantitative findings are based on the *N Indian Canyon/19th Ave High-Cube Warehouse Greenhouse Gas Analysis* (GHGA), dated December 15, 2023. The purpose of the GHGA was to evaluate project-related construction and operational emissions and determine the level of GHG impacts from construction and operation of the proposed project. The GHGA methodology relied on CalEEMod Version 2022 as the current and prescribed version of this software. As previously described in the Air Quality Section, CalEEMod utilizes widely accepted methodologies for estimating emissions. Sources of these methodologies and default data include but are not limited to the United States Environmental Protection Agency (USEPA) AP-42 emission factors, CARB vehicle emission models, and studies commissioned by California agencies such as the California Energy Commission (CEC) and CalRecycle.

The GHGA report referenced in this section is provided in **Appendix H** of this Draft EIR.

4.7.2 Existing Conditions

The project site includes approximately 38 acres consisting of undeveloped and relatively level terrain with scattered vegetation, within the City of Palm Springs's Industrial land use designation.

According to the U.S. Environmental Protection Agency (EPA), greenhouse gases (GHG) are a group of gases that trap solar energy in the Earth's atmosphere and are steadily increasing global land and ocean temperatures. Greenhouse gases include, but are not limited to, water vapor, carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), hydrochlorofluorocarbons (HCFCs), ozone (O_3), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF_6). Carbon dioxide is the most abundant GHG while other GHGs are more potent pound for pound. Human activities (such as burning carbon-based fossil fuels) also generate water vapor and CO_2 as byproducts, thereby increasing the level of atmospheric warming.

Carbon dioxide-equivalence (CO_2e) is a metric used to compare emissions and associated warming of various greenhouse gases. It is the mass of carbon dioxide that would produce the same estimated warming as a given mass of another greenhouse gas.

Global Climate Change (GCC) is defined as the change in average meteorological conditions on the earth with respect to temperature, precipitation, and storms.

GHGs are the result of both natural and human activities, including motor vehicle travel, air travel, consumption of fossil fuels for power generation, industrial processes, heating and cooling, landfills, and agriculture. Wildfires, both natural and human-caused, are also a major source of GHG emissions. The significant adverse effects of increasing GHG concentrations in the atmosphere have resulted in the adoption of governmental policies and regulations on federal, state and local levels that are intended to reduce GHG emissions by development projects, transportation and other activities.

4.7.3 Regulatory Setting

Federal

Clean Air Act

The Clean Air Act (CAA) is the comprehensive federal law that regulates air emissions from stationary and mobile sources. Among other things, this law authorizes EPA to establish National Ambient Air Quality Standards (NAAQS) to protect public health and public welfare and to regulate emissions of hazardous air pollutants. The Clean Air Act (CAA) has served as the primary basis for federal regulation of greenhouse gas emissions, particularly through CAA section 111, which covers emissions regulation for stationary facility sources. Under Section 111(b) of the Clean Air Act, EPA is authorized to set New Source Performance Standards (NSPS) for greenhouse gas (GHG) emissions from new, modified, and reconstructed fossil fuel-fired power plants.

State

California Assembly Bill 32 (AB 32)

In September 2006, Governor Arnold Schwarzenegger signed AB 32, the California Global Warming Solutions Act of 2006, which required that statewide GHG emissions be reduced to 1990 levels by the year 2020. This reduction was to be accomplished through an enforceable statewide cap on GHG emissions beginning in 2012. To implement the cap, AB 32 directs CARB to develop and implement regulations to reduce statewide GHG emissions from stationary sources. In November 2007, CARB completed its estimates of 1990 GHG levels and established 427 million metric tons of carbon dioxide equivalent ($MTCO_2e$) as the total statewide aggregated greenhouse gas 1990 emissions level and the 2020 emissions limit or target. The California GHG Emissions Inventory and Trends discussion provided

below summarizes the State's progress in reducing GHGs based on information collected through various AB 32 programs.

Senate Bill 32 (SB 32)

Senate Bill 32 (2016) adds Section 38566 to the Health and Safety Code and requires that CARB ensure statewide GHG emissions meet the 40% reduction target no later than December 31, 2030.

CARB Scoping Plan

2022 CARB Scoping Plan

On December 15, 2022, CARB adopted the 2022 Scoping Plan for Achieving Carbon Neutrality (2022 Scoping Plan). The 2022 Scoping Plan builds on the 2017 Scoping Plan as well as the requirements set forth by AB 1279, which directs the state to become carbon neutral no later than 2045. To achieve this statutory objective, the 2022 Scoping Plan lays out how California can reduce GHG emissions by 85% below 1990 levels and achieve carbon neutrality. The 2022 Scoping Plan sets one of the most aggressive approaches to reach carbon neutrality in the world.

The key elements of the 2022 CARB Scoping Plan focus on transportation - the regulations that will impact this sector are adopted and enforced by CARB on vehicle manufacturers and outside the jurisdiction and control of local governments.

Under the 2022 Scoping Plan, the State will lead efforts to meet the 2045 carbon neutrality goal through implementation of a number of objectives, provided in **Appendix H**.

The 2022 Scoping Plan lays out the framework to achieve the AB 1279 target of 85 percent below 1990 levels by 2045 and identifies a need to accelerate the 2030 target to 48 percent below 1990 levels.

Senate Bill 375

SB 375, signed into law in September 2008, aligns regional transportation planning efforts, regional GHG reduction targets, and land use and housing allocations. The act requires metropolitan planning organizations (MPOs), such as SCAG, to adopt a Sustainable Communities Strategy (SCS) or Alternative Planning Strategy (APS) that prescribes land use allocation in that MPO's regional transportation plan (RTP). CARB, in consultation with MPOs, provided regional reduction targets for GHGs for the years 2020 and 2035.

SB 100

The 100 Percent Clean Energy Act of 2018, otherwise known as SB 100, set a 2045 goal of powering all retail electricity sold in California and state agency electricity needs with renewable and zero-carbon resources, such as solar and wind energy that do not emit climate-altering greenhouse gases. SB 100 also updated the state's Renewables Portfolio Standard to ensure that by 2030 at least 60 percent of

California's electricity is renewable; and required the Energy Commission, Public Utilities Commission and Air Resources Board to use programs under existing laws to achieve 100 percent clean electricity and issue a joint policy report on SB 100 by 2021 and every four years thereafter.

AB 1493

AB 1493, enacted on July 22, 2002, required CARB to develop and adopt regulations that reduce GHGs emitted by passenger vehicles and light duty trucks. Implementation of the regulation was delayed by lawsuits filed by automakers and by the EPA's denial of an implementation waiver. The EPA subsequently granted the requested waiver in 2009, which was upheld by the U.S. District Court for the District of Columbia in 2011. The standards were projected to result in about a 22% reduction compared with the 2002 fleet. The updated regulations are projected to reduce GHGs from new cars by 34% from 2016 levels by 2025.

California GHG Emissions Inventory and Trends

California's annual statewide GHG emission inventory is a relevant tool for tracking California's progress in reducing GHGs and achieving the statewide GHG target. The GHG inventory relies on data collected through various California Global Warming Solutions Act (AB 32) programs. On July 11, 2018, CARB announced that greenhouse gas pollution in California fell below 1990 levels for the first time since emissions peaked in 2004, an achievement roughly equal to taking 12 million cars off the road or saving 6 billion gallons of gasoline a year. In 2017, emissions from GHG emitting activities statewide were 424 million metric tons of CO2 equivalent (MMTCO2e), 5 MMTCO2e lower than 2016 levels and 7 MMTCO2e below the 2020 GHG Limit of 431 MMTCO2e. The data also show that for the first time since California started to track GHG emissions, the state power grid used more energy from zero-GHG sources like solar and wind power than from electrical generation powered by fossil fuels. On July 28, 2021, CARB announced that the state Greenhouse Gas Inventory shows emissions have continued to drop below the 2020 target, which is a return to the 1990 GHG levels. The target was achieved four years ahead of schedule in 2016.

Wildfires impact human health and safety, and release greenhouse gas (GHG) emissions and other air pollutants, including those that contribute to ozone formation.

The State's 2022 Scoping Plan recognizes that of the twenty largest wildfires ever recorded in California, nine occurred in 2020 and 2021. The largest wildfire season ever recorded in state history was in 2020, where more than 4.3 million acres burned, and over 112 million metric tons of carbon dioxide (CO2) were emitted into the atmosphere.

AB 1279

AB 1279 or the "California Climate Crisis Act," declared the policy of the state both to achieve net zero greenhouse gas emissions as soon as possible, but no later than 2045, and achieve and maintain net negative greenhouse gas emissions thereafter. The law required CARB to work with relevant state

agencies to ensure that updates to the scoping plan identify and recommend measures to achieve these policy goals and to identify and implement a variety of policies and strategies that enable carbon dioxide removal solutions and carbon capture, utilization, and storage technologies in California.

S-3-05

In 2005, Governor Schwarzenegger issued Executive Order S-3-05 establishing various GHG reduction targets for the State of California, including, GHG emissions to 2000 levels by 2010, GHG emissions to 1990 levels by 2020, and GHG emissions to 80 percent below 1990 levels by 2050.

B-30-15

In 2015, Governor Brown issued Executive Order B-30-15 to establish a new interim statewide greenhouse gas emission reduction target to reduce greenhouse gas emissions to 40 percent below 1990 levels by 2030 in order to ensure California meets its target of reducing greenhouse gas emissions to 80 percent below 1990 levels by 2050. All state agencies with jurisdiction over sources of greenhouse gas emissions were required to implement measures to meet the 2030 and 2050 greenhouse gas emissions reductions targets.

N-79-20

In 2020, California Governor Gavin Newsom issued Executive Order N-79-20, setting new statewide goals for phasing out gasoline-powered cars and trucks in California, including a zero-emission requirement for all in-state sales of new passenger cars and trucks by 2035. Similarly, under this Order, 100% of in-state sales of medium- and heavy-duty trucks and buses are to be zero-emission by 2045, where feasible; and 100% of off-road vehicles and equipment sales are to be zero-emission by 2035, where feasible.

Regional

Southern California Association of Governments 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy (2020-2045 RTP/SCS)

Southern California Association of Governments (SCAG) is the federally designated Metropolitan Planning Organization (MPO). SCAG is responsible for developing long-range transportation plans and sustainable communities strategies for the region in accordance with federal and state law and planning requirements, including but not limited to federal Clean Air Act ambient air quality standards and ambient air quality and greenhouse gas emissions reductions standards and targets. The Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) is updated and adopted every four years. The current 2020-2045 RTP/SCS (also known as Connect SoCal 2020) was CARB certified to meet the applicable 2035 greenhouse gas (GHG) emissions reduction target for automobiles and light trucks.

The Sustainable Communities Strategy (SCS) component of the 2020-2045 RTP/SCS is designed to comply with the Sustainable Communities and Climate Protection Act (SB 375) to reduce greenhouse gas (GHG) emissions from passenger vehicle use through integrated transportation, housing, and land use planning. SCAG's 2020 SCS estimates an 8 percent and a 19 percent decrease in GHG per capita emissions from light-duty passenger vehicles by 2020 and 2035, respectively, compared to 2005.

South Coast Air Quality Management District (SCAQMD)

SCAQMD is the agency responsible for air quality planning and regulation in the SCAB. The SCAQMD addresses the impacts to climate change of projects subject to SCAQMD permit as a lead agency if they are the only agency having discretionary approval for the project and acts as a responsible agency when a land use agency must also approve discretionary permits for the project. The SCAQMD helps local land use agencies through the development of models and emission thresholds that can be used to address GHG emissions.

In 2008, SCAQMD formed a Working Group to identify GHG emissions thresholds for land use projects that could be used by local lead agencies in the SCAB. The Working Group developed several different options that are contained in the SCAQMD Draft Guidance Document – Interim CEQA GHG Significance Threshold, which could be applied by lead agencies. The working group has not provided additional guidance since the release of the interim guidance in 2008. The SCAQMD Board has not approved the thresholds; however, the Guidance Document provides substantial evidence supporting the approaches to significance of GHG emissions that can be considered by the lead agency in adopting its own threshold. The current interim thresholds consist of the following tiered approach:

Tier 1 consists of evaluating whether or not the project qualifies for any applicable exemption under CEQA.

Tier 2 consists of determining whether the project is consistent with a GHG reduction plan. If a project is consistent with a qualifying local GHG reduction plan, it does not have significant GHG emissions.

Tier 3 consists of screening values, which the lead agency can choose, but must be consistent with all projects within its jurisdiction. A project's construction emissions are averaged over 30 years and are added to the project's operational emissions. If a project's emissions are below one of the following screening thresholds, then the project is less than significant:

- Residential and commercial land use: 3,000 $MTCO_2e$/yr
- Industrial land use: 10,000 $MTCO_2e$/yr
- Based on land use type: residential: 3,500 $MTCO_2e$/yr; commercial: 1,400 $MTCO_2e$/yr; or mixed use: 3,000 $MTCO_2e$/yr

Tier 4 has the following options:

- Option 1: Reduce Business-as-Usual (BAU) emissions by a certain percentage; this percentage is currently undefined.
- Option 2: Early implementation of applicable AB 32 Scoping Plan measures
- Option 3: 2020 target for service populations (SP), which includes residents and employees: 4.8 $MTCO_2e$ per SP per year for projects and 6.6 $MTCO_2e$ per SP per year for plans;

- Option 3, 2035 target: 3.0 $MTCO_2e$ per SP per year for projects and 4.1 $MTCO_2e$ per SP per year for plans

Tier 5 involves mitigation offsets to achieve target significance threshold.

The SCAQMD's interim thresholds used the Executive Order S-3-05-year 2050 goal as the basis for the Tier 3 screening level. Achieving the Executive Order's objective would contribute to worldwide efforts to cap CO2 concentrations at 450 ppm, thus stabilizing global climate.

SCAQMD only has authority over GHG emissions from development projects that include air quality permits. At this time, it is unknown if the project would include stationary sources of emissions subject to SCAQMD permits. Notwithstanding, if the project requires a stationary permit, it would be subject to the applicable SCAQMD regulations.

SCAQMD Regulation XXVII, adopted in 2009 includes the following rules:

- Rule 2700 defines terms and post global warming potentials.
- Rule 2701, SoCal Climate Solutions Exchange, establishes a voluntary program to encourage, quantify, and certify voluntary, high quality certified GHG emission reductions in the SCAQMD.
- Rule 2702, GHG Reduction Program created a program to produce GHG emission reductions within the SCAQMD. The SCAQMD would fund projects through contracts in response to requests for proposals or purchase reductions from other parties.

Rule 201 (Permit to Construct).

A person shall not build, erect, install, alter or replace any equipment or agricultural permit unit, the use of which may cause the issuance of air contaminants or the use of which may eliminate, reduce or control the issuance of air contaminants without first obtaining written authorization for such construction from the Executive Officer. A permit to construct shall remain in effect until the permit to operate the equipment or agricultural permit unit for which the application was filed is granted or denied, or the application is canceled.

Rule 203 (Permit to Operate)

A person shall not operate or use any equipment or agricultural permit unit, the use of which may cause the issuance of air contaminants, or the use of which may reduce or control the issuance of air contaminants, without first obtaining a written permit to operate from the Executive Officer or except as provided in Rule 202. The equipment or agricultural permit unit shall not be operated contrary to the conditions specified in the permit to operate.

Form 400-A

This is the basic permit application providing information about the equipment that will be constructed and operated and the company that will own the equipment, among other details. This form is required for all Rule 201 and Rule 203 applications.

SCAQMD is the agency responsible for air quality planning and regulation in the SCAB. The SCAQMD addresses the impacts to climate change of projects subject to SCAQMD permit as a lead agency if they are the only agency having discretionary approval for the project and acts as a responsible agency when

a land use agency must also approve discretionary permits for the project. The SCAQMD acts as an expert commenting agency for impacts to air quality. This expertise carries over to GHG emissions, so the agency helps local land use agencies through the development of models and emission thresholds that can be used to address GHG emissions.

County of Riverside CAP

The County of Riverside Climate Action Plan (CAP) was designed under the premise that the County of Riverside, and the community it represents, is uniquely capable of addressing emissions associated with sources under the County of Riverside jurisdiction, and that the County of Riverside emission reduction efforts should coordinate with the state strategies of reducing emissions in order to accomplish these reductions in an efficient and cost-effective manner.

The CAP Update (November 2019) establishes GHG emission reduction programs and regulations that correlate with and support evolving State GHG emissions reduction goals and strategies. The CAP Update includes reduction targets for the year 2030 and year 2050. These reduction targets require the County of Riverside to reduce emissions by at least 525,511 MT CO2e below the adjusted BAU (ABAU) scenario by 2030 and at least 2,982,948 MT CO2e below the ABAU scenario by 2050.

To evaluate consistency with the CAP Update, the County of Riverside has implemented CAP Update Screening Tables (Screening Tables) to aid in measuring the reduction of GHG emissions attributable to certain design and construction measures incorporated in development projects. To this end, the Screening Tables establish categories of GHG Implementation Measures. Under each Implementation Measure category, mitigation or project design features (collectively "features") are assigned point values that correspond to the minimum GHG emissions reduction that would result from each feature.

Relative to new commercial and industrial development, the GHG emissions reductions offered by each measure were assigned a point value calculated in the CAP methodology at 0.0322 MTCO2e per point, per 1,000 square feet of gross building area.

Projects that yield at least 100 points are considered to be consistent with the GHG emissions reduction quantities anticipated in the County of Riverside GHG Technical Report and support the GHG emissions reduction targets established under the CAP Update.

An industrial project garnering 100 points would achieve a reduction of approximately 3.22 MTCO2e per 1,000 square feet of building area, as determined by multiplying the reduction of 0.0322 MTCO2e per point by the target point total of 100. The County CAP methodology does not consider project size as a factor to attain consistency since the target reduction is based on units of building area, in respect to commercial or industrial development.

The potential for such projects to generate direct or indirect GHG emissions that would result in a significant impact on the environment; or conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases would be considered less-than-

significant. The City of Palm Springs has agreed on the project's use of the County of Riverside CAP standard for determining GHG impacts.

Local

Palm Springs General Plan

The Air Quality Element of the Palm Springs General Plan (GP) includes various goals and policies designed to address air quality issues and protect the quality of life from the criteria air pollutants, including ozone and PM_{10}. The Air Quality Element recognizes that CARB is the entity most apt to adopt regulations that achieve the maximum feasible and cost-effective reduction of greenhouse gas emissions from motor vehicles. Of the four air quality goals (AQ1 through AQ4), Goal AQ4 is the most relevant to GHG and climate change. Goals AQ1 through AQ4 pertain to other air pollutants, such as particulate matter, and therefore are discussed in the Air Quality section.

Goal AQ4 - Reduce vehicular emissions.

Policy AQ4.4: Encourage walking or bicycling for short-distance trips through the creation of pedestrian-friendly sidewalks and street crossings and efficient and safe bikeways.

Policy AQ4.5: Integrate land use and transportation planning to the greatest extent possible.

City of Palm Springs Climate Action Plan

On October 15, 2019, the Palm Springs Sustainability Commission agreed to develop a roadmap to acknowledge the seriousness of our current climate crisis, describe what the City has already done and plans to do to address climate change, and identify potential additional actions. The goal is to reduce greenhouse gas emissions to 1990 levels by 2020, 80% below 1990 by 2050, and achieve carbon neutrality for municipal emissions by 2030. This is consistent with the target identified by the state in AB 32. The City's currently approved CAP developed in 2013 does not provide criteria applicable for the proposed private development. Therefore, the City determined that the appropriate threshold for GHG reduction was the use of the methodology of County of Riverside Climate Action Plan Update.

4.7.4 Project Impacts

Thresholds of Significance

The following thresholds or criteria are derived from Appendix G of the CEQA Guidelines and are used to determine the level of potential effect. The significance determination is based on the recommended criteria set forth in Section 15064 of the CEQA Guidelines. For analysis purposes, development of the Palm Springs Fulfillment Center would have a significant effect on greenhouse gas emissions if it will:

a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment; or

b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

Methodology

As previously introduced, the air quality findings are based primarily on the *N. Indian Canyon/19th Ave High-Cube Warehouse Greenhouse Gas Analysis (GHGA)*, dated December 15, 2023. The GHGA evaluated the potential impacts related to greenhouse gas emissions associated with construction and operation of the proposed project utilizing the CalEEMod Version 2022, as the current and prescribed software method for quantifying emissions.

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

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

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

Consideration #1: The extent to which the project may increase or reduce greenhouse gas emissions as compared to the existing environmental setting.

Consideration #2: Whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project.

Consideration #3: The extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of greenhouse gas emissions. Such regulations or requirements must be adopted by the relevant public agency through a public review process and must reduce or mitigate the project's incremental contribution of greenhouse gas emissions. In determining the significance of impacts, the lead agency may consider a project's consistency with the State's long-term climate goals or strategies, provided that substantial evidence supports the agency's analysis of how those goals or strategies address the project's incremental contribution to climate change and its conclusion that the project's incremental contribution is not cumulatively considerable.

As previously noted, the City uses as a threshold the County of Riverside CAP Update, which provides a menu of options for energy efficiency, renewable energy, water conservation measures, and additional measures that provide predictable GHG reductions. Each option within the screening tables includes point values based upon the GHG reduction that each measure can achieve relative to a development project. Projects that achieve at least 100 points from the screening tables are determined to have provided a fair-share contribution of GHG reductions and, therefore, are considered consistent with the County of Riverside CAP Update. Because the County of Riverside CAP Update addresses GHG emissions reductions and is consistent with the requirements of AB 32, SB 32, and international efforts to reduce GHG emissions, projects that comply with the CAP Update are assumed to have a less than significant GHG impact.

Construction Emission Factors:

Consistent with the Air Quality Impact Study, the GHGA utilized a conservative construction duration from January of 2024 through April of 2025 for activities ranging from initial site preparation to the finishing stages involved with final completion. The approximate construction duration factors, measured in business days with 8 hours of operation, involved 20 days of site preparation, 75 days of grading, 287 days of building construction, 30 days of paving, and 55 days of architectural coating. Per the preliminary grading plan, the GHGA analysis assumed balanced earthwork condition during the grading stage, involving no import or export of soils. The construction phase durations are considered conservative because they are generally longer periods than what may be determined with additional detailed information on construction management.

Construction activities will generate on-road vehicle emissions from vehicle usage for workers and vendors commuting to and from the site. The GHGA assumptions for construction equipment use included rubber-tired dozers, crawler tractors, excavators, graders, scrapers, cranes, forklifts, generator sets, tractors/loaders/backhoes, welders, pavers, paving equipment, rollers, and air compressors at various quantities based on the stage of construction and operating total of eight (8) hours per day. The GHGA utilized construction trip assumptions based on CalEEMod default values with a conservative adjustment (increase) for vendor trips proportional to the project scale. Details are provided in **Appendix H**.

For construction phase project emissions, GHGs are quantified and amortized over the life of the project. To amortize the emissions over the life of the project, the SCAQMD recommends calculating the total GHG emissions for the construction activities, dividing it by a 30-year project life then adding that number to the annual operational phase GHG emissions.

Operational Emission Factors:

The GHGA factored operational activities associated with the project that include area source emissions, energy source emissions, mobile source emissions, on-site cargo handling equipment emissions, water supply, treatment, and distribution, solid waste, refrigerants.

Area Source Emissions include landscape maintenance equipment such as lawnmowers, shedders/grinders, blowers, trimmers, chain saws, and hedge trimmers used to maintain the landscaping of the project. The emissions associated with landscape maintenance equipment were calculated based on assumptions provided in CalEEMod.

Energy Source Emissions are generated by electricity and natural gas. Because electrical generating facilities for the project area are located either outside the region (state) or offset through the use of pollution credits (RECLAIM) for generation within the SCAB, criteria pollutant emissions from offsite generation of electricity are generally excluded from the evaluation of significance and only natural gas use is considered. The project does not propose utilizing natural gas, apart from the use of exterior cargo handling equipment. Therefore, the project will not need to connect to the existing natural gas infrastructure.

Mobile Source Emissions derive primarily from vehicle trips generated by the project, including employee trips to and from the site and truck trips associated with the proposed uses. Per the N Indian Canyon/19th Ave High-Cube Warehouse Traffic Analysis, the proposed project is expected to generate approximately 1,574 total trips per day, which include 1,294 passenger car trips per day and 280 truck trips per day. Details regarding trip characteristics and vehicle mix are provided in **Appendix H**.

On-Site Cargo Handling Equipment Emissions: It is common for industrial buildings to require the operation of exterior cargo handling equipment in the building's truck court areas. For this project, on-site modeled operational equipment includes up to four (4) 200 horsepower (hp), natural gas-powered cargo handling equipment – port tractors operating at 4 hours a day for 365 days of the year.

Water Supply Treatment, and Distribution result in indirect GHG emissions from the production of electricity used to convey, treat, and distribute water and wastewater. Unless otherwise noted, CalEEMod default parameters were used.

Solid Waste will result from the project. GHG emissions from landfills are associated with the anaerobic breakdown of material. GHG emissions associated with the disposal of solid waste were calculated by CalEEMod using default parameters.

Air conditioning (A/C) equipment associated with the building are anticipated to generate GHG emissions. CalEEMod automatically generates a default A/C and refrigeration equipment inventory for each project land use subtype based on industry data from the USEPA (2016b). GHG emissions associated with refrigerants were calculated by CalEEMod using default parameters.

a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment

Project implementation would result in construction-phase and operational GHG emissions. For construction phase project emissions, GHGs were quantified and amortized over the life of the project. The construction emission factors are explained in the methodology section. The annual and amortized construction emissions are presented in **Table 4.7-1**.

Table 4.7-1 Amortized Annual Construction Emissions

Year	Emissions (MT/yr)				
	CO_2	CH_4	N_2O	R	Total CO_2e
2024	1,388.83	0.05	0.06	1.02	1,408.76
2025	576.29	0.02	0.03	0.48	584.93
Total GHG Emissions	1,965.11	0.07	0.09	1.50	1,993.69
Amortized Construction Emissions	**65.50**	**0.00**	**0.00**	**0.05**	**66.46**

Operational Emissions

The annual GHG emissions associated with the project are summarized in **Table 4.7-2** based on the operational emission factors discussed in the methodology section. As shown in **Table 4.7-2**, construction and operation of the project would generate a net total of approximately 9,438.47 $MTCO_2e/yr$.

Table 4.7-2 Project GHG emissions

Emission Source	Emissions (MT/yr)				
	CO_2	CH_4	N_2O	R	Total CO_2e
Amortized Construction Emissions	65.50	2.33E-03	2.83E-03	4.99E-02	66.46
Mobile Source	7,828.68	0.12	0.72	10.25	8,056.38
Area Source	10.80	0.00	0.00	0.00	10.84
Energy Source	580.86	0.05	0.01	0.00	584.22
Water Usage	182.34	5.57	0.13	0.00	361.51
Waste	62.01	6.20	0.00	0.00	216.96
On-site equipment	0.00	0.00	0.00	0.00	142.10
Total CO_2e (All Sources)	**9,438.47**				

County of Riverside CAP

The City of Palm Springs determined that the County of Riverside CAP provided the threshold standard for determining GHG impacts since the City's 2013 CAP does not allow for project-specific analysis. The

purpose of the County of Riverside CAP Update is to provide guidance on how to analyze GHG emissions and determine significance during the CEQA review of proposed development projects within the County. To address the state's requirement to reduce GHG emissions, the County prepared its CAP Update with the goal of reducing GHG emissions within the County by 49% below "existing" 2008 levels by the year 2030. The County's target is consistent with the AB 32 target and ensures that the County will be providing GHG reductions locally that will complement state efforts to reduce GHG emissions. The County's target is also consistent with the SB 32 target that expands on AB 32 to reduce GHG emissions to 40% below the 1990 levels by 2030. Because the County's CAP Update addresses GHG emissions reductions and is consistent with the requirements of AB 32, SB 32, and international efforts to reduce GHG emissions, compliance with the CAP Update fulfills the description of mitigation found in the State CEQA Guidelines.

The CAP identifies a two-step approach in evaluating GHG emissions. First, a screening threshold of 3,000 MTCO2e/yr is used to determine if additional analysis is required. Projects that exceed the 3,000 MTCO2e/yr will be required to demonstrate and achieve a minimum 25% reduction of GHG emissions from a 2011-year level of efficiency compared to the mitigated project buildout year or demonstrate at least 100 points (equivalent to an approximate 15% reduction in GHG emissions) through the CAP Screening Tables.

As shown on Table 4.7-2, the project will result in approximately 9,438.47 MTCO2e/yr; the proposed project would exceed the County's screening threshold of 3,000 MTCO2e/yr. Thus, the project would have the potential to result in a cumulatively considerable impact with respect to GHG emissions. Since the project exceeds the 3,000 MTCO2e/yr threshold, the project's impacts would be significant unless mitigated. As described in Mitigation Measure GHG-1, the project is required to demonstrate compliance with the County's CAP Screening Tables and achieve a minimum of 100 points as identified in the CAP. For reference, an industrial (or commercial) project garnering 100 points would achieve a reduction of approximately 3.22 MTCO2e per 1,000 square feet of building area, as determined by multiplying the reduction of 0.0322 MTCO2e per point by the 100-point total. The County CAP methodology does not consider project size as a factor to attain consistency since the target reduction is based on units of building area for commercial or industrial development.

A preliminary analysis of the project's consistency is provided in Table 4.7-3 and demonstrates that feasible measures are available to reduce the project's impacts pertaining to building envelope, indoor space efficiencies, building efficiency, clean energy, water efficiency, and clean energy measures.

Table 4.7-3 CAP Consistency – Commercial/Industrial Land Use

Feature	Description	Points
EE10.A.1 - Insulation	Modestly Enhance Insulation (walls R-13, roof/attic R-38)	9
EE10.A.2 - Windows	Modestly Enhanced Window Insulation (0.4 U-factor, 0.32 SHGC)	4
EE10.A.3 - Cool Roofs	Modest Cool Roof (CRRC Rated 0.15 aged solar reflectance, 0.75 thermal emittance)	7
EE10.A.4 - Air Infiltration	Air barrier applied to exterior walls, calking, and visual inspection such as the HERS Verified Quality Insulation Installation (QII or equivalent)	7
EE10.B.1 - Heating/Cooling Distribution System	Enhanced Duct Insulation (R-8)	6
EE10.B.2 - Space Heating/Cooling Equipment	Improved Efficiency HVAC (EER 14/78% AFUE or 8 HSPF)	4
EE10B.4 - Water Heaters	High Efficiency Water Heater (0.72 Energy Factor)	10
EE10.B.6 - Artificial Lighting	Efficient Lights (25% of in-unit fixtures considered high efficiency. High efficiency is defined as 40 lumens/watt for 15 watt or less fixtures; 50 lumens/watt for 15-40 watt fixtures, 60 lumens/watt for fixtures >40watt)	5
EE10.B.7 - Appliances	Energy Star Commercial Refrigerator (new) Energy Star Commercial Dishwasher (new)	4
EE10.C.1 - Building Placement	North/south alignment of building or other building placement such that the orientation of the buildings optimizes conditions for natural heating, cooling, and lighting.	4
EE10.C.2 - Shading	At least 90% of south-facing glazing will be shaded by vegetation or overhangs at noon on Jun 21st.	6
CE1.B.1 - Photovoltaic	30 percent of the power needs of the project	8
W2.D.1 - Water Efficient Landscaping	Only low water using plants. Only California Native landscape that requires no or only supplemental irrigation.	8
W2.D.2 - Water Efficient Irrigation Systems	Low precipitation spray heads< .75”/hr or drip irrigation. Weather based irrigation control systems combined with drip irrigation (demonstrate 20% reduced water)	4
W2.E.2 - Toilets	Water Efficient Toilets/Urinals (1.5 gpm)	3
W2.E.3 - Faucets	Water Efficient faucets (1.28 gpm)	2
W2.E.4 - Commercial Dishwashers	Water Efficient dishwashers (20% water savings)	2
W2.F.1 - Recycled Water	Graywater (purple pipe) irrigation system on site	5
T4.B.1 – Electric Vehicle Recharging	Install EV charging stations in garages/parking areas	176
	TOTAL POINTS EARNED BY COMMERCIAL/INDUSTRIAL PROJECT	***274***

The proposed project's ability to achieve a total of 274 points would be equivalent to a reduction of approximately 8.8228 MTCO2e per 1,000 square feet of building area, which is approximately 2.74 times greater than the target reduction of 3.22 MTCO2e per 1,000 square feet of building area required by the Plan. Based on the project's 739.36 1,000-square-foot units, the project would achieve a total reduction of approximately 6,523.22 MTCO2e if it reached 274 points, which exceeds the minimum requirement (2,380.74 MTCO2e) for the project's size and demonstrates that the project can feasibly mitigate its GHG impacts. Because the project plans do not provide the level of specificity that allow the completion of the screening tables, **Mitigation Measure GHG-1** is provided below to assure that final project plans are analyzed and demonstrate compliance with the County standard.

As provided in **Mitigation Measure GHG-1**, the project shall implement Screening Table Measures providing for a minimum 100 points per the County Screening Tables. The City shall verify incorporation of the identified Screening Table Measures within the project building plans and site designs prior to the issuance of building permit(s). The City shall verify implementation of the identified Screening Table Measures prior to the issuance of Certificate(s) of Occupancy.

The Screening Table Measures would achieve a minimum of 100 Screening Table Points and would thereby ensure that the Project would achieve GHG emissions levels and GHG emissions reduction targets consistent with those identified in the County CAP Update.

Although consistency with the CAP Update methodology is a measure of building efficiency and GHG reduction with respect to the County target, this approach would not result in a reduction to GHG emissions from short-term construction or operational mobile sources. Operational mobile sources totaling approximately 8,056.38 MTCO2e per year represent approximately 85 percent of the project's total annual GHG emissions, which are not directly reduced by the building efficiency measures under the CAP Update Screening Table. Therefore, this analysis conservatively considers that the project's impacts would be significant and unavoidable.

b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases

2022 Scoping Plan Consistency

The project would not impede the State's progress towards carbon neutrality by 2045 under the 2022 Scoping Plan. The project would be required to comply with applicable current and future regulatory requirements promulgated through the 2022 Scoping Plan. Some of the current transportation sector policies the project will comply with (through vehicle manufacturer compliance) include: Advanced Clean Cars II, Advanced Clean Trucks, Advanced Clean Fleets, Zero Emission Forklifts, the Off-Road Zero-Emission Targeted Manufacturer rule, Clean Off-Road Fleet Recognition Program, In-use Off-Road Diesel-Fueled Fleets Regulation, Off-Road Zero-Emission Targeted Manufacturer rule, Clean Off-Road Fleet Recognition Program, Amendments to the In-use Off-Road Diesel-Fueled Fleets Regulation, carbon

pricing through the Cap-and-Trade Program, and the Low Carbon Fuel Standard. As such, the project would be consistent with the 2022 Scoping Plan.

Consistency with the County of Riverside CAP

The purpose of the County of Riverside CAP Update is to provide guidance on how to analyze GHG emissions and determine significance during the CEQA review of proposed development projects within the County. Because the County of Riverside CAP Update addresses GHG emissions reductions and is consistent with the requirements of AB 32, SB 32, and international efforts to reduce GHG emissions, compliance with the CAP Update fulfills the description of mitigation found in the State CEQA Guidelines.

Pursuant to **MM GHG-1**, the project will implement Screening Table Measures providing for a minimum 100 points per the County Screening Tables. Since **MM GHG-1** requires a minimum of 100 points, with incorporation of **MM GHG-1**, the project would be consistent with the CAP Update. By achieving the 100-point minimum, the project would be consistent with the GHG Development Review Process' requirement to achieve at least 100 points and thus the project is considered to have a less than significant individual and cumulatively considerable impact on GHG emissions.

Consistency with the Southern California Association of Governments 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy (2020-2045 RTP/SCS)

SCAG is responsible for developing long-range transportation plans and sustainable strategies for the region in accordance with federal and state law and planning requirements. The Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) would meet the applicable 2035 greenhouse gas (GHG) emissions reduction target for automobiles and light trucks of a 19 percent per capita reduction by 2035 relative to 2005 levels.

The project proposes to develop a two-story industrial building of approximately 739,360-square-foot within the City of Palm Springs's Industrial land use designation. The project would not involve new residential development introducing a direct population growth. The Population and Housing Section found that the project could generate approximately 718 jobs, but it is reasonable to assume that the new jobs could be filled by existing residents of the City and Coachella Valley region. Therefore, there would not be a substantial growth in population and the project would be consistent with the City and regional population growth projections.

4.7.5 Cumulative Impacts

GHG emissions are understood to be inherently cumulative in nature with global implications with different lengths of time that they remain in the atmosphere and active GHGs. The statewide climate change programs and GHG reduction strategies forming part of AB 32 and subsequent climate change legislation, established a measurable regulatory standard for quantifying and understanding potential GHG impacts resulting from land development activities, like the proposed project. Through a series of

press releases, CARB has provided updates on the attainment progress toward the statewide GHG emission targets. On July 28, 2021, CARB announced via Press Release No. 21-3the 2020at state Greenhouse Gas Inventory shows emissions have continued to drop below 2020 target, which is a return to the 1990 GHG levels. The target was achieved four years ahead of schedule in 2016. Data for 2019 demonstrated that annual emissions fell from 425 million metric tons in 2018 to 418 million metric tons in 2019, below the 431 million metric ton target. Moreover, annual per capita GHG emissions in California have dropped from a 2001 peak of 14.0 metric tons per person to 10.5 metric tons per person in 2019, a 25 percent decrease and about half the national average for per capita emissions. The County of Riverside CAP Update and associated methodology have been developed to comply with the Statewide AB 32 goals.

Since mobile emissions generally represent a large portion of GHG emissions for new development, the proposed project and other projects proposed in the future will contribute to cumulatively considerable impacts in the context of other large-scale projects in the Coachella Valley region.

4.7.6 Mitigation Measures

GHG-1 The project shall implement Screening Table Measures providing for a minimum 100 points per the County Screening Tables. The City shall verify incorporation of the identified Screening Table Measures within the project building plans and site designs prior to the issuance of building permit(s). The City shall verify implementation of the identified Screening Table Measures prior to the issuance of Certificate(s) of Occupancy.

4.7.7 Level of Significance After Mitigation

With the use of **Mitigation Measure GHG-1**, the project would be required to achieve a 100-point reduction needed for consistency in relation to the County of Riverside CAP analysis. Nevertheless, as explained above, CAP consistency would not lower the calculated GHG emission estimates from construction and operational mobile sources. Operational mobile sources represent approximately 85 percent of the project's total annual GHG emissions, which are not reduced by the building efficiency measures under the CAP Update Screening Table methodology. Therefore, the project will have a significant and unavoidable impact on GHG emissions.

4.7.8 Resources

1. Analysis of the Coachella Valley PM10 Redesignation Request and Maintenance Plan, by the California Air Resources Board, February 2010
2. California Greenhouse Gas Emissions for 2000 to 2019, Trends of Emissions and Other Indicators, 2021 Edition, California Air Resources Board, July 28, 2021

3. Press Release No. 18-37 & 19-35, California Air Resources Board Press Release, July 2018 and August 2019
4. N Indian Canyon/19th Ave High-Cube Warehouse Greenhouse Gas Analysis (GHGA), Urban Crossroads, December 15, 2023.
5. Federal Clean Air Act (CWA)
6. Final 2016 Air Quality Management Plan (AQMP), by South Coast Air Quality Management District (SCAQMD), March 2017
7. Final 2003 Coachella Valley PM10 State Implementation Plan (CVSIP), by SCAQMD, August 2003; and sections of the SCAQMD Rule Book
8. West Virginia v. Environmental Protection Agency Bulletin, Cornell Law School Legal Information Institute, accessed February 4, 2023

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4.8 Hazards and Hazardous Materials

4.8.1 Introduction

This section describes the existing setting and proposed improvements to the project site and subsequent operations that could result in the use, transport, or disposal of hazardous materials. This section also analyzes impacts associated with the project that may potentially affect public health and safety. The analysis is based on the information contained in the *Palm Springs General Plan* regarding land uses within the City, as well as policy references provided by the Department of Toxic Substances, the State Water Resources Control Board, and the Environmental Protection Agency. Additional federal, State, and local programs and regulations related to hazards and the use of hazardous materials are referenced in this section, in addition to information in the *Phase I Environmental Site Assessment* (ESA) that was prepared for the project site by MSA Consulting, Inc. in June 2022 (**Appendix I**).

4.8.2 Existing Conditions

Hazardous Materials and Waste

The Code of Federal Regulations (CFR Title 40, Part 261) defines hazardous materials based on ignitability, reactivity, corrosivity, and/or toxicity properties. The State of California defines hazardous materials as substances that are toxic, ignitable or flammable, reactive and/or corrosive, which have the capacity of causing harm or a health hazard during normal exposure or an accidental release. As a result, the use and management of hazardous or potentially hazardous substances is regulated under existing federal, State, and local laws.

The United States Environmental Protection Agency (EPA) simply defines hazardous waste as a waste with properties that make it dangerous or capable of having a harmful effect on human health or the environment. Hazardous waste is generated from sources ranging from industrial manufacturing process wastes to batteries and may come in many forms, including liquids, solids, gases, and sludges. These can include everyday commercial products, such as pesticides, cleaning fluids, and household sprays, as well as byproducts of manufacturing processes. The EPA has classified hazardous waste into four categories:

- Listed wastes – wastes from common manufacturing and industrial processes, waste from specific industries such as petroleum refining or pesticide manufacturing, and discarded commercial products;
- Characteristic wastes – non-listed wastes that exhibit ignitability, corrosively, reactivity, and toxicity;

- Universal wastes – batteries, mercury-containing equipment, and fluorescent lamps and bulbs; and
- Mixed wastes – radioactive and hazardous waste components.

All hazardous wastes must be discharged into a Class I landfill. No Class I landfill is currently operated within Riverside County. Hazardous wastes generated within Riverside County are transported to Kern County or Santa Barbara County, where active Class I landfills are located. Some waste is also transported out of the State.

Palm Springs has many businesses that manufacture, transport, store, use and dispose of hazardous materials. The City, therefore, has the potential to be affected by a major hazardous material emergency or affected in general by hazardous materials and waste. State Highway 111, the Interstate 10 freeway, and the Southern Pacific Railroad corridor are all used to transport hazardous materials through the City.

Project Site

The Palm Springs Fulfillment Center project would result in the development of a 739,360-square-foot fulfillment center with offices. Additional project improvements include landscaping along the project frontages, paved drive aisles and parking spaces, a detention basin along the southern property boundary, and gated entry points.

Offsite improvements

In addition to the proposed onsite development, project implementation would also include the project's connection to the Mission Springs Water District's (MSWD) existing sewer and domestic water infrastructure. The proposed point of connection for sewer is located approximately a half-mile west of the project site in 19th Avenue. Domestic water would connect to a 12-inch water main on 19th Avenue located within the right-of-way.

Local Schools

The project site is located within the boundary of the Palm Springs Unified School District. The closest school to the proposed project is Two Bunch Palms Elementary School, which is located approximately 2.95 miles northeast of the project site at 14250 West Drive, in Desert Hot Springs.

Public Airports/Private Airstrips

The nearest airport facility to the project is the Palm Springs International Airport, located at 3400 East Tahquitz Canyon Way, approximately 5 miles to the southeast. The project site is located outside of the Airport's Land Use Compatibility Zone.

Urban/Wildland Interface

Wildland environments are typically located at the slopes and adjacent mountain ranges. Wildland areas are located along the western and southern boundaries of the City, where the San Jacinto Mountains and the Santa Rosa Mountains meet the urban boundaries of the City.

The project site is located in the northern portion of the City of Palm Springs, surrounded by developed and undeveloped uses. The project is not located adjacent to the mountain slopes and therefore, not located near any wildland interface.

4.8.3 Regulatory Setting

Key federal, State, and local laws, regulations and policies that are relevant to hazards and hazardous materials are summarized below. The regulatory setting establishes a framework for addressing all aspects of hazards and hazardous materials that would be affected by construction and operations of the proposed project.

Federal Programs

United States Environmental Protection Agency

The EPA is a federal agency with the mission to protect human health and the environment by developing and enforcing regulations, providing grants, studying environmental issues, sponsoring partnerships, publishing information, and educating people about the environment.

The EPA also maintains a list of hazardous materials and procedures when dealing with hazardous waste and materials. Various rules regulate the use, storage, transportation and disposal of hazardous materials.

A waste is determined to be hazardous if it is specifically listed on one of four lists (the F, K, P and U lists) found in title 40 of the Code of Federal Regulations (CFR) in Section 261 and discussed in further detail below:

- **The F-list** identifies wastes from common manufacturing and industrial processes as hazardous from non-specific sources (40 CFR Section 261.31). They can be divided into seven groups depending on the type of manufacturing or industrial operation that creates them. These groups include spent solvent wastes, electroplating and other metal finishing wastes, dioxin-bearing wastes, chlorinated aliphatic hydrocarbons production, wood preserving wastes, petroleum refinery wastewater treatment sludges, and multisource leachate.
- **The K-list** identifies hazardous wastes from specific sectors of industry and manufacturing and are considered source-specific wastes. To qualify as a K-listed hazardous waste, a waste must fit into one of the following industries: wood preservation, organic chemicals manufacturing, pesticides manufacturing, petroleum refining, veterinary pharmaceuticals manufacturing, inorganic pigment manufacturing, inorganic chemical manufacturing, explosives

manufacturing, iron and steel production, primary aluminum production, secondary lead processing, ink formulation, and coking (processing of coal to produce coke).

- **The P and U lists** designate as hazardous waste pure and commercial grade formulations of certain unused chemicals that are being disposed. For a waste to be considered a P- or U-listed waste it must meet the following three criteria: (1) the waste must contain one of the chemicals listed on the P or U list; (2) the chemical in the waste must be unused; and (3) the chemical in the waste must be in the form of a commercial chemical product. The P-list identifies acute hazardous wastes from discarded commercial chemical products, while the U-list identifies hazardous wastes from discarded commercial chemical products.

More recent EPA efforts and responsibilities for managing hazardous waste include the management of wastes from homeland security incidents. The Waste Management for Homeland Security Incidents Act requires EPA to provide technical support to federal, State, local, and tribal authorities on waste management and cleanup efforts resulting from natural disasters, terrorist attacks, major accidents, and disease outbreaks. EPA's main responsibility is to promote pre-planning efforts to deal with hazardous waste disasters and encourage various stakeholders to prepare for natural and man-made disasters. EPA is also required to review emergency response plans for federal agencies, and participate in exercises with federal, State, local and tribal emergency responders.

Resource Conservation and Recovery Act

The EPA has the authority and responsibility to regulate hazardous waste through the Resource Conservation and Recovery Act of 1976 (RCRA). Through RCRA, EPA is responsible for monitoring the generation, transportation, treatment, storage, and disposal of hazardous waste. Amendments to RCRA, including the 1984 Federal Hazardous and Solid Waste Amendments, and those established in 1986, required EPA to increase enforcement of underground storage tanks for petroleum and other hazardous substances, focus on waste minimization programs, such as phasing out hazardous wastes from landfills, and mandating corrective measures regarding the release of hazardous waste.

Hazardous Materials Transport Regulations

The Pipeline and Hazardous Materials Safety Administration's (PHMSA) Office of Hazardous Materials Safety is a component of the U.S. Department of Transportation (DOT) that carries out a national safety program, including security matters, to protect against the risks to life and property inherent in the transportation of hazardous materials in commerce by all transportation modes. This is accomplished by developing, proposing and implementing regulatory policy initiatives and regulations governing the safe and secure transportation of hazardous materials. The PHMSA conducts safety inspections and investigations to ensure transportation safety and security by conducting compliance inspectors and incident and accident response and investigations.

Comprehensive Environmental Response, Compensation, and Liability Act

The Comprehensive Environmental Response, Compensation, and Liability Act, otherwise known as CERCLA or Superfund, was established to provide a federal "Superfund" to clean up uncontrolled or abandoned hazardous-waste sites as well as accidents, spills, and other emergency releases of pollutants and contaminants into the environment. Through CERCLA, the EPA was given power to seek out those parties responsible for any release and assure their cooperation in the cleanup.

CERCLA was reauthorized and expanded in 1986.

Emergency Planning and Community Right-To-Know Act

The Emergency Planning and Community Right-To-Know Act (EPCRA) was enacted in 1986 and is designed to help local communities protect public health, safety, and the environment from chemical hazards. Congress requires each state to appoint a State Emergency Response Commission (SERC) as a part of EPCRA. The SERCs are required to divide their states into Emergency Planning Districts and to name a Local Emergency Planning Committee (LEPC) for each district. The EPCRA requires industry to report on the storage, use and releases of hazardous substances to federal, State, and local governments.

Clean Water Act

The Clean Water Act (CWA) was established in 1972 as the basic structure for regulating discharges of pollutants into the waters of the United States and regulating quality standards for surface waters. Under the CWA, the EPA has implemented pollution control programs such as setting wastewater standards for industries. The EPA has also developed national water quality criteria recommendations for pollutants in surface waters.

It is unlawful under the CWA to discharge any pollutant from a point source, which is a discrete conveyance such as pipes or man-made ditches, into navigable waters unless a permit is obtained. The National Pollutant Discharge Elimination System (NPDES) permit program controls discharges. Industrial, municipal, and other facilities must obtain permits if their discharges go directly to surface waters. Compliance monitoring under the NPDES Program encompasses a range of techniques in order to address the most significant problems and to promote compliance among the regulated community.

EPA Enforcement and Compliance History Online

EPA's Enforcement and Compliance History Online (ECHO) is a national database that focuses on inspection, violation, and enforcement data for the Clean Air Act (CAA), CWA and RCRA and also includes Safe Drinking Water Act (SDWA) and Toxics Release Inventory (TRI) data. ECHO can be used to search for facilities, investigate pollution sources, search for EPA enforcement cases, examine and create enforcement-related maps, and analyze trends in compliance and enforcement data.

State Programs

Hazardous Waste Control Law

The Hazardous Waste Control Law (HWCL) is the primary hazardous waste management system in the State of California. The HWCL specifies that generators have the primary duty to determine whether their wastes are hazardous and to ensure their proper management. The HWCL also establishes criteria for the reuse and recycling of hazardous wastes used or reused as raw materials. The HWCL standards exceeds federal requirements by mandating source reduction planning and has much broader requirement for permitting facilities that treat hazardous waste. It also regulates a number of types of waste management activities that are not covered by the RCRA.

Tanner Act

Although there are numerous State policies dealing with hazardous waste materials, the most comprehensive is the Tanner Act (AB 2948) that was adopted in 1986. The Tanner Act governs the preparation of hazardous waste management plans and the siting of hazardous waste facilities in the State of California. The act also mandates that each county adopt a Hazardous Waste Management Plan. To be in compliance with the Tanner Act, local or regional hazardous management plans need to include provisions that define (1) the planning process for waste management, (2) the permit process for new and expanded facilities, and (3) the State appeal process available for certain local decisions.

California Environmental Protection Agency

The California Environmental Protection Agency (CalEPA) has broad jurisdiction over hazardous materials management. CalEPA's mission to restore, protect and enhance the environment, to ensure public health, environmental quality and economic vitality is achieved by developing, implementing and enforcing environmental laws. These laws regulate air, water, and soil quality, pesticide use, and waste recycling and reduction. CalEPA oversees and coordinates with the Air Resources Board (ARB), Department of Resources Recycling and Recovery (CalRecycle), Department of Pesticide Regulation (DPR), Department of Toxic Substances Control (DTSC), Office of Environmental Health Hazard Assessment (OEHHA), and the State Water Resources Control Board (SWRCB) to improve California's environment.

State Water Resources Control Board (SWRCB)

SWRCB is responsible for regulating wastewater discharges to surface waters and groundwater. This includes discharges from all construction, industrial, municipal, and agricultural activities. The SWRCB delegates these responsibilities to various regional water quality control boards (RWQCB) throughout California. The City of Palm Springs is located in Region 7, Colorado River Basin RWQCB.

Hazardous Material Management Plans

In January 1996, CalEPA adopted regulations implementing a Unified Hazardous Waste and Hazardous Materials Management Regulatory Program (Unified Program). The six program elements of the Unified Program are hazardous waste generators and hazardous waste on-site treatment, underground storage tanks, above-ground storage tanks, hazardous material release response plans and inventories. The program is implemented at the local level by a local agency, the Certified Unified Program Agency (CUPA). The CUPA is responsible for consolidating the administration of the six program elements within its jurisdiction.

California Hazardous Material Release Response Plan and Inventory Law

Chapter 6.95 of the Health and Safety Code (HSC) requires that in order to protect the public health and safety and the environment, it is necessary to establish business and area plans relating to the handling and release or threatened release of hazardous materials (Article 1), as well as implement regulations regarding hazardous material management (Article 2), emergency planning and Community Right-to-Know Act of 1986 (Article 3) and the California Toxic Release Inventory Program Act of 2007 (Article 4).

California Emergency Response Plan

California has developed an emergency response plan to coordinate emergency services provided by federal, State, and local governments and private agencies. Response to hazardous materials incidents is one part of this plan. The plan is managed by the Governor's Office of Emergency Services (Cal OES), which coordinates the responses of other agencies, including CalEPA, California Highway Patrol (CHP), RWQCB, and the Riverside County Emergency Management Department.

California Occupational Safety and Health Administration

The Division of Occupational Safety and Health (DOSH), better known as Cal/OSHA, protects workers from health and safety hazards on the job in almost every workplace in California through its research, standards, enforcement, and consultation programs. Cal/OSHA enforces complaint and accident investigations, targeted and programmed inspections, citations, special orders and orders to take special action, orders prohibiting use, as well as permits, certifications, licenses, approvals, and classification.

OSHA Regulations ensure safe and healthful conditions for workers by setting and enforcing standards and by providing training, outreach, education, and assistance. To fulfill this purpose, OSHA develops and enforces mandatory job safety and health standards. These standards are codified in 29 CFR Part 1910, which address issues that range in scope from walking and working surfaces, to exit routes and emergency planning, to hazardous materials and personal protective equipment. They include exposure limits for a wide range of specific hazardous materials, as well as requirements that

employers provide personal protective equipment to their employees wherever it is necessary (i.e., when required by the label instructions). OSHA standards also require that chemical manufacturers and importers obtain and develop Safety Data Sheets (SDSs). Employers must have an SDS in the workplace for each chemical they use.

Regional and Local Programs

Regional Water Quality Control Board

The RWQCB acts under Cal EPA and is responsible for implementing regulations pertaining to management of soil and groundwater investigations and cleanup. RWQCB regulations are contained in Title 27 of the California Code of Regulations (CCR). Additional State regulations applicable to hazardous materials are contained in Title 22 of the CCR. Title 26 of the CCR is a compilation of those hazardous material, waste, and toxic-related regulations contained in CCR Titles 3, 8, 13, 17, 19, 22, 23, 24, and 27 that are applicable to hazardous materials.

The Colorado River Basin RWQCB is responsible for overseeing corrective actions associated with leaks and improper disposal from underground storage tanks, such as gas station tanks, and provides assistance to County of Riverside Department of Environmental Health on underground storage leaks.

Riverside County Department of Environmental Health

The Riverside County Department of Environmental Health (DEH) provides programs and services related to protecting public health, safety and the environment. Within the DEH are two divisions, District Environmental Service, and Environmental Protection and Oversight. The Environmental Protection and Oversight Division (EPO) is responsible for handling and regulating hazardous materials, land use, water systems, underground storage tanks, solid waste and business emergency plans and for managing a list of all hazardous waste generators in the County. In the City of Palm Springs such generators of hazardous waste include golf courses, gas stations, dry cleaners, grocery stores, and car dealerships. The Riverside County DEH's Hazardous Materials Management Division was designated as the Riverside County CUPA.

City of Palm Springs General Plan

Chapter 6, Safety Element, of the City General Plan discusses natural and manmade hazards that might occur within the City and provides goals, policies, and actions that can reduce the risk of the hazards in order to protect and preserve the health, safety and welfare of the community. Potential hazards associated with the storage, use, and transport of hazardous materials in and throughout the City are discussed in the Safety Element, as well as disaster preparedness, response, and recovery. The General Plan contains goals and policies intended to reduce hazards within the City.

Goal SA5: Decrease the risk of exposure of life, property and the environment to hazardous and toxic materials and waste.

Policy SA5.1 Promote the proper disposal, handling, transport, delivery, treatment, recovery, recycling, and storage of hazardous materials in accordance with applicable federal, state, and local regulations.

Policy SA5.3 Conger with the appropriate responsible agencies to determine the need for, and the appropriateness of, developing a permitting process for the establishment of facilities which manufacture, store, use, or dispose of hazardous and toxic materials within the community or adjacent areas.

Policy SA5.4 Establish and implement procedures in coordination with appropriate state and federal agencies for the cleanup of existing and future hazardous and toxic waste sites.

Policy SA5.5 Follow the response procedures outlined within the Riverside County Fire Department's Hazardous Materials Area Plan in the event of a hazardous material emergency.

Action SA5.1 Compile and maintain an inventory of all hazardous waste sites in the City.

Action SA5.4 Continually update maps of the City's emergency facilities, evacuation routes, and hazardous areas to reflect additions or modifications.

City of Palm Springs Municipal Code

Section 2.20 of the Municipal Code establishes a Disaster Council to provide for the preparation and carrying out of plans for the protection of persons and property within this city in the event of an emergency; the direction of the emergency organization; and the coordination of the emergency functions of this city with all other public agencies, corporations, organizations, and affected private persons.

City of Palm Springs Emergency Operations Plan

The City prepared the Emergency Operations Plan (EOP) in 2012 (revised in 2019) to address the planned response and recovery to emergencies or major disasters associated with natural disasters, technological incidents, and national security emergencies. It provides an overview of operational concepts, identifies components of the City's emergency management organization, and describes the overall responsibilities of the federal, state, and county entities and the City for protecting life and property and assuring the overall well-being of the population. The EOP is a flexible, multi-hazard document that focuses on extraordinary emergencies, rather than day-to-day emergencies.

City of Palm Springs Emergency Operations Center

The Palm Springs Emergency Operations Center (EOC) is located at Palm Springs City Hall, 3200 Tahquitz Way. The alternate EOC is located at Fire Station #442, 300 North El Cielo Road (headquarters). The EOC is a location from which centralized disaster/emergency management can be performed during a major disaster. The EOC is responsible for managing and coordinating disaster/emergency operations; developing emergency policies and procedures; receiving and disseminating warning information; and providing emergency information and instructions to the public.

City of Palm Springs Local Hazard Mitigation Plan

Similar to the EOP, the Palm Springs Local Hazard Mitigation Plan (LHMP) identifies the City's hazards, review and assess past disaster occurrences, estimate the probability of future occurrence and set goals and mitigate potential risks to reduce or eliminate long-term risk to people and property from natural, human-caused, and technological hazards.

4.8.4 Project Impact Analysis

Thresholds of Significance

The following standards and criteria for establishing significance of potential impacts related to hazards and hazardous materials were derived from the CEQA Guidelines, Appendix G. Development of the proposed project would have a significant effect to if it is determined that the project would:

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.

Prior to the preparation of the Draft EIR, the Palm Springs Fulfillment Center Initial Study and Notice of Preparation (NOP) were prepared (**Appendix A**). Following the screening criterion related to hazards and hazardous materials in the Initial Study, threshold topics "c", "d", "e" and "g" do not require additional analysis in this Draft EIR.

Threshold "c": *Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school:*

- There are no existing or proposed schools within one-quarter mile of the project. The closest school to the proposed project is Two Bunch Palms Elementary School, located approximately 2.95 miles northeast of the project site.

Threshold "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:*

- Pursuant to the Cortese List Government Code 65962.5 and its subsections, record searches on the project property determined that the vacant project is not located on a site which is included on a list of hazardous materials sites, and, as a result, would not create a significant hazard to the public or the environment.

Threshold "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:*

- The project is not located within an airport land use plan or private airstrip. The Palm Springs International Airport is located approximately 5 miles to the southeast, and the Bermuda Dunes Airport is located approximately 18.60 miles southeast of the project. As a result, the project is located outside each of the airport's influence and planning area. Flights approaching and departing the Palm Springs and Bermuda Dunes Airports may fly over the City and the project site with intermittent frequency; however, no hazards or hazardous materials impacts are anticipated.

Threshold "g": *Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires:*

- According to Cal Fire's Fire Hazard Severity Zone Maps, the project site is not located within or near a moderate, high, or very high fire severity zone. Therefore, impacts of wildfires are not anticipated at the project site.

Issue areas identified as having no impact are further discussed in **Chapter 6.0, *Effects Found to Have No Impact,*** of this Draft EIR.

Methodology

Existing data was analyzed to assess whether the construction and operation of the proposed fulfillment center might generate significant impacts associated with hazards and hazardous materials.

Project Impacts

a/b. Create a significant hazard to the public or the environment due to routine transport, use, or disposal of hazardous materials, or 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

The project site is currently vacant and undeveloped. Surrounding land uses include vacant and undeveloped land to the north and west, and industrial and commercial uses to the south and east. Indian Canyon Drive, the eastern boundary of the project, is considered a major thoroughfare, while 19th Avenue is a secondary thoroughfare on the south boundary of the site. Interstate 10 (I-10) freeway is located approximately 0.34 miles south of the project. The transportation, use, and disposal of hazardous materials during project construction and operation is discussed below.

Construction

Construction of the proposed project is expected to involve the temporary management and use of oils, fuels and other potentially flammable substances that power and lubricate construction equipment. In addition, materials such as paints, adhesives, solvents, and other substances typically used in building construction would be located on the project site during construction. These substances could be considered hazardous if improperly stored or handled. Improper use, storage, or transportation of hazardous materials can result in accidental releases or spills, potentially posing health risks to workers, the public, and the environment. The nature and quantities of these products would be limited to what is necessary to carry out construction of the proposed project and are not anticipated to create significant impacts due to the limited quantities used in construction and the timeline of construction for the project. As outlined in the **Chapter 3.0, *Project Description***, project construction would occur in one phase. Additionally, construction contractors must adhere to federal, State, and local regulations when disposing of construction waste.

Designated controlled areas on the site would be temporarily located in staging areas typically placed close to where development is occurring at that time. To ensure the proper management of potentially hazardous materials on the construction site, the identification of building material staging areas is required by Construction General Permit (CGP) (Order No. 2009-0009-DWQ as amended by 2010-0014-DWQ and 2012-0006-DWQ) administered by the RWQCB, which requires the development and implementation of a project-specific SWPPP for areas greater than one acre. Per

the CGP, the project's SWPPP must include comprehensive handling and management procedures for building materials, especially those that are hazardous and toxic. Paints, solvents, pesticides, fuels and oils, other hazardous materials or any building materials that have the potential to contaminate stormwater should be stored indoors or under cover whenever possible or in areas with secondary containment. The designation of staging areas for activities such as fueling vehicles, mixing paints, plaster, mortar, and so on, is also required to be determined in the SWPPP. When handled properly by trained individuals and consistent with the manufacturer's instructions and industry standards, the risk involved with handling these materials is considerably reduced to a less than significant level. As a requirement of the CGP, the contractor would be required to identify all controlled staging areas within the project limits for storing materials and equipment.

Best management practices (BMPs) are required in the SWPPP for proper material delivery and storage; material use; and spill prevention and control. These temporary measures outline the required physical improvements and procedures to prevent impacts of pollutants and hazardous materials to workers and the environment during construction. The contractor would also be required to implement BMPs to assure that impacts are minimized and that any minor spills are immediately and properly remediated. In addition, perimeter controls (fencing with wind screen), linear sediment barriers (gravel bags, fiber rolls, or silt fencing), and access restrictions (gates) would help prevent temporary impacts. Colorado River Basin RWQCB requires that the project develops and implements SWPPP in compliance with the requirements of the CGP. With the compliance of the CGP, less than significant impacts are anticipated during construction.

The project location is within the Coachella Valley Blowsand Zone that is exposed to seasonal wind conditions and natural sand transport capable of producing fugitive dust from undeveloped and unstable ground conditions. Health hazards and regulatory requirements associated with fugitive dust are discussed in **Section 4.2, *Air Quality***.

Offsite improvements would include the project's connection to existing domestic water facilities and existing sewer facilities located approximately a half-mile west of the project in 19th Avenue. Domestic water provided by Mission Springs Water District (MSWD) would connect to a 12-inch water main on 19th Avenue located within the right-of-way. Sewer would also be provided by MSWD. Construction for the proposed sewer line connection would occur in the existing road right-of-way. Similar to on-site improvements, construction of the off-site improvement is expected to involve the temporary management and use of oils, fuels and other potentially flammable substances. Off-site construction activities would require the implementation of appropriate BMPs in order to reduce the risk of spills and leaks of hazardous materials used. Therefore, impacts are anticipated to be less than significant.

Operation

The proposed project includes the operation of a 739,360-square-foot high cube warehouse with fulfillment capabilities. High cube warehouse operations involve the sorting of packages (either

manually or mechanically automated) for vehicle deliveries. Operation of the proposed project would involve the use of materials common to commercial or industrial developments that are labeled hazardous (e.g., solvents and commercial cleaners, petroleum products, and pesticides, fertilizers, and other landscape maintenance materials). The existing land use designation for the project property is Industrial, and the zoning designation is Manufacturing Zone (M-2). Based on the zoning of the proposed project, future tenants of the industrial building could have a different industrial use permitted within the M-2 designation. According to Section 92.17.1.00 of the Municipal Code, M-2 zones are intended to provide for the development of warehouse and distribution centers, and industrial uses which include fabrication, manufacturing, assembly or processing. Industrial land uses allowed within M-2 zones could include cannabis lounge/dispensary or distribution, fabrication, manufacturing, wholesale, warehouse, distribution, fulfillment, import/export centers, equipment sales, rental and storage services, trailer and boat storage, emergency shelters, animal day care or hospital, and adult oriented business.

Storage

Although the project is proposing the industrial building to function as a high cube warehouse, possible future tenants of the building are unknown.

If the industrial building is used as a high cube warehouse, operation could involve the storage of materials common to commercial or industrial developments that are labeled hazardous (e.g., solvents and commercial cleaners, petroleum products, and pesticides, fertilizers, and other landscape maintenance materials). There is the potential for routine storage of other hazardous materials, however, the precise materials are not known, as the tenants of the proposed high cube warehouse are not yet defined. In a high cube warehouse, hazardous materials could only be stored and transported, and no hazardous materials would be manufactured in the facility.

If the industrial building's future tenant includes manufacturing or another use specified in Section 92.17.1.00 of the Municipal Code, hazardous materials stored at the building could differ. Under Chapter 6.95, Article 2, of the California HSC, operators of stationary sources of hazardous materials (if they are deemed an accident risk) are required to prepare risk management plans (RMPs), detailing strategies to reduce the risk of accidental hazardous material release and submit them to the California Emergency Management Agency. Additionally, industrial facilities that store hazardous materials (e.g., fuel, pesticides) exceeding the threshold quantity would prepare a Hazardous Materials Business Plan (HMBP), as required by Chapter 6.95 of the California HSC and enforced by the Riverside County Department of Environmental Health (DEH). A Hazardous Materials Handler is identified as any facility storing hazardous materials and or wastes in quantities greater than or equal to:

- 55 gallons of a liquid substance
- 500 pounds of a solid substance

- 200 cubic feet of compressed gas

If the industrial building tenant stores the hazardous materials or wastes in quantities greater than or equal to the amounts listed above, the project must implement a HMBP. The information from the HMBP is made available to first responders in the County for emergency response activities. All handlers are required to disclose their inventory of hazardous materials in the HMBP. The Riverside County DEH, as CUPA for the County, will manage and assure implementation of a project-specific HMBP, should the project tenant require one. Data generated for HMBP compliance is managed through the Statewide California Environmental Reporting System (CERS).

HMBPs must include at least the following:

- A list of the chemical name and common names of every hazardous substance or chemical product handled by the business;
- The category of waste, including the general chemical and mineral composition, of every hazardous waste handled by the business;
- The maximum amount of each hazardous material or mixture containing a hazardous material that is present onsite;
- Sufficient information on how and where the hazardous materials are handled by the business to allow fire, safety, health, and other appropriate personnel to prepare adequate emergency responses to potential releases of the hazardous materials;
- Emergency response plans and procedures in the event of a reportable release or threatened release of a hazardous material; and
- Training for all new employees and annual training, including refresher courses, for all employees on safety procedures in the event of a release or threatened release of a hazardous material.

Under the administration of the County of Riverside DEH, and in compliance with the Hazardous Materials Release Response Plans and Inventory Law, Chapter 6.95 of the HSC, any business handling and/or storing a hazardous material shall obtain a permit from the DEH and electronically submit a business plan in the Statewide Informational Management System.

A tenant of the industrial building could include the storage or handling of hazardous materials, as defined in Chapter 8.64 of the Riverside County Code and would be required to follow the procedures established in the Municipal Code and Chapter 6.95 of the HSC. The implementation of the HMBP and its compliance with the codes listed above as well as the adherence to federal, State, and regional regulatory standards listed above would ensure impacts related to the storage and the risk of accidental releases of hazardous materials associated with the project are less than significant.

Use/Handling

The operation of the project may include the use and handling of hazardous materials, depending on the tenants.

High cube warehouse operations, such as the proposed project, could use common hazardous materials such as petroleum products, pesticides, fertilizer, and other household hazardous products such as paint products, solvents, and cleaning products. The handling, application, and storage of cleaning agents, building maintenance products, paints, solvents and other related substances expected to carry out the necessary operations within the project would occur in a manner typical of existing industrial projects throughout the City. However, these materials would not be present in sufficient quantities to pose a significant hazard to public health and safety, or the environment. Additionally, the proposed high cube warehouse would not involve manufacturing.

Future tenant use could include manufacturing uses and other uses specified in Section 92.17.1.00 of the Municipal Code. Manufacturing use of the site could increase the risk of potential hazards to the public or the environment due to the increased volumes of hazardous materials on site, as compared to warehouse uses. The California Accidental Release Prevention (CalARP) Program was designed to prevent accidental release of hazardous substances, minimize damage if releases occur, and satisfy community right-to-know laws. The CalARP programs and implementing regulations (Title 19, Division 2, Chapter 4.5 of the CCR) require businesses that handle more than a threshold quantity of regulated substances to develop a RMP, as discussed above. The tenant would be required to comply with the CalARP program to prevent the accidental release of hazardous substances during use.

Any tenant, whether a high cube warehouse or another industrial use, and all their employees would be required to comply with OSHA regulations and standards, including worker personal protective equipment (PPE) requirements, and maintaining SDSs for each chemical they use to protect the health of workers. Additionally, hazardous materials, if onsite, would be handled in compliance with manufacturer's standards to ensure proper use and handling.

Overall, the adherence to federal, State, and regional regulatory standards, would ensure impacts related to the use of hazardous materials associated with the project, and the risk of accidental releases of hazardous materials would be less than significant.

Off-Site Improvements

Sanitary sewer service and domestic water for the project area are provided by MSWD. Sewer connections to the site would occur on 19th Avenue from an existing 6-inch sewer line approximately 650 feet east of the project in 19th Avenue. The project would extend the sewer line to connect to the project. Connection to the sewer lines would occur underground within the existing rights-of-way. Domestic water would connect to an existing 12-inch water main on 19th Avenue located within the right-of-way.

The operation of off-site sewer and water lines are not anticipated to result in the routine transport, use, or disposal of hazardous materials. The potential for release of hazardous materials into the environment associated with construction of these lines would be subject to the same construction regulations described for the project. Therefore, the use of hazardous materials associated with the off-site improvements would result in less than significant impacts.

f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan

The Safety Element of the Palm Springs General Plan addresses multiple components of the City's public safety services, including police and fire service, emergency response and preparedness. The Safety Element also discusses natural and manmade hazards that might occur in the City, and presents goals, policies, and actions that can help reduce the risk of these hazards.

In addition to the General Plan, the City also established an Emergency Operations Plan (EOP) and Local Hazard Mitigation Plan (LHMP). The Palm Springs EOP is a flexible, multi-hazard document that addresses the City of Palm Springs's planned response and short-term recovery to extraordinary emergency situations associated with natural disasters, technological incidents, and national security emergencies. The EOP defines the scope of preparedness and incident management activities; describes the organizational structures, roles and responsibilities, policies and protocols for providing emergency support; facilitates response and short-term recovery activities; and describes the purpose, situation, and assumptions, concept of operations, organization and assignment of responsibilities, administration and logistics, plan development and maintenance and authorities and references. Emergency management activities are often associated with four emergency management phases: 1) preparedness, 2) response, 3) recovery, and 4) mitigation.

Similarly, the LHMP identifies the City's hazards, reviews and assesses past disaster occurrences, estimates the probability of future occurrences and sets goals to mitigate potential risks to reduce or eliminate long-term risk to people and property from natural, human-caused, and technological hazards. Transportation hazards are ranked number three on the list of potential hazards, while hazardous materials are ranked number 12.

Evacuation routes surrounding the project are provided by Interstate 10 (I-10) and State Highway 111. These routes are also the regional access routes to the City. According to the EOP hazardous materials and transportation are considered threats within the City. However, as stated above, the project will be required to follow the procedures established in the Municipal Code and Chapter 6.95 of the HSC if the tenant stored or handled hazardous materials, as defined in Chapter 8.64 of the Riverside County Code (see discussion a/b above).

Additionally, project operation would consist of trucks traveling to and from the site. The California Highway Patrol is in charge of spills that occur along freeways, with Caltrans and local police and fire

departments responsible for providing additional assistance. The project is located approximately 0.32 miles north of the I-10 interchange at Indian Canyon Drive. Highway 111 is located approximately 3.30 miles southwest of the project. The City of Palm Springs has developed and maintains an extensive roadway network. The project proposes no changes to that network. Gated access to the project would not limit access to authorized personnel, trucks, and emergency vehicles. Vehicles accessing the street from the project would not interfere with evacuation routes or plans, insofar as the project would not alter any existing street used for these purposes.

The project proposes a high cube warehouse on approximately 38 acres. Road improvements include:

- Constructing 19th Avenue from the project's western boundary to Indian Canyon Drive at its ultimate half-section width as a Secondary Thoroughfare (64 feet of pavement width) in compliance with the applicable City of Palm Springs standards.
- Constructing Indian Canyon Drive from the project's northern boundary to 19th Avenue at its ultimate half-section width plus a lane as a Major Thoroughfare (76 feet of pavement width) in compliance with the applicable City of Palm Springs standards.
- Emergency access (key pad for emergency access)
- Safety features (fire sprinklers, fire line, etc.)

Construction of the roadways would occur during development of the project, including the underground connection of the proposed project water and sewer lines to the existing underground facilities, located along Indian Canyon Drive and 19th Avenue. Project access points would be reviewed by the Fire Department, to ensure adequate access for emergency vehicles. The Fire Department requires the installation of a Knox-Box Rapid Entry System or similar device to facilitate emergency access by fire fighters and other emergency responders. This requirement would be included as a condition of approval for the project and assures that on-site emergency access impacts would be less than significant.

Project implementation is not expected to interfere with the critical facilities, emergency transportation and circulation, or emergency preparedness coordination. Therefore, the project would not interfere with an emergency evacuation or response plan. Additionally, prior to construction, both the Fire Department and Police Department will review the project to ensure safety measures are addressed, including emergency access. The project will be reviewed by City staff and police and fire department officials to ensure adequate police and fire service and safety as a result of project implementation. Potential impacts are therefore determined to be less than significant.

4.8.5 Cumulative Impacts

Hazardous materials and risk of upset conditions are largely site-specific and would occur on a case-by-case basis for each individual project, in conjunction with development proposals on these

properties. All developments in the City are required to evaluate potential threats to public, safety, including those associated with the accidental release of hazardous materials into the environment during construction and operation, emergency response, transport/use/disposal of hazardous materials, and hazards to sensitive receptors (including schools). Similarly, all projects would be required to analyze and properly mitigate any impacts to an evacuation plan if impacts are identified.

The construction and operation of individual projects is regulated by local, State, and federal standards on a project-by-project basis. For example, an individual project may be required to implement a Hazardous Materials Business Plan (HMBP) if the project uses or stores hazardous materials greater than or equal to 55 gallons of a liquid substance, 500 pounds of a solid substance, or 200 cubic feet of compressed gas. With the implementation of local, State, and federal regulations for the proposed project and individual future projects, cumulative impacts would not be significant.

Adherence to federal, State, and regional regulatory standards would ensure impacts related to the release of hazardous materials associated with the project and future projects would remain less than significant.

4.8.6 Mitigation Measures

No significant impacts from hazards and hazardous materials are identified from the construction and operation of the proposed project, and no mitigation measures are required.

4.8.7 Level of Significance After Mitigation

Implementation of existing regulations and standards identified above would ensure that the project's potential impacts associated with hazards and hazardous materials would be reduced to less than significant levels.

4.8.8 Resources

1. City of Palm Springs General Plan, Chapter 6 Safety Element and Chapter 4 Circulation Element, https://www.palmspringsca.gov/government/departments/planning/general-plan.
2. Standards 29 CFR Part 1910, Occupational Safety and Health Administration, US Department of Labor, https://www.osha.gov/laws-regs/regulations/standardnumber/1910.
3. Chapter 6.95, Hazardous Materials Release Response Plans and Inventory, Health and Safety Code, https://leginfo.legislature.ca.gov/faces/codes_displayText.xhtml?division=20.&chapter=6.95.&lawCode=HSC&article=1.
4. Local Hazard Mitigation Plan, 2017, Palm Springs Annex https://www.palmspringsca.gov/home/showpublisheddocument/69283/637062911754830000

5. Palm Springs Emergency Operations Plan, 2012, https://www.palmspringsca.gov/home/showpublisheddocument/64808/636873976019430000

4.9 Hydrology and Water Quality

4.9.1 Introduction

The purpose of this section is to present the project environmental setting, identify both the applicable thresholds of significance and the project's potentially significant impacts, and identify applicable mitigation measures capable of reducing any potentially significant impacts to hydrology and water quality to below a level of significance.

The analysis primarily relies on the hydrology, surface drainage, and water quality data and information compiled in the Palm Springs Fulfillment Center Preliminary Hydrology Report, Preliminary Grading Plan, and Preliminary Water Quality Management Plan (WQMP).

Additional reference documents relevant to hydrology and water quality include the Palm Springs Master Drainage Plan, dated November 1982; Federal Clean Water Act (CWA); Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM) Panel 06065C0895G, effective August 28, 2008; Water Quality Control Plan for the Colorado River Basin Region (Basin Plan), effective March 30, 2023; Whitewater River Region Water Quality Management Plan for Urban Runoff and the associated Whitewater River Watershed MS4 Permit, effective June 20, 2013; 2013 Mission Creek-Garnet Hill Subbasin Water Management Plan, dated January 2013; Indio Subbasin Sustainable Groundwater Management Act (SGMA) Plan; 2018 Coachella Valley Integrated Regional Water Management and Stormwater Resources Plan, December 2018; 2020 Coachella Valley Regional Urban Water Management Plan (2020 RUWMP), and the Palm Springs 2007 General Plan, adopted in 2007.

Primary considerations for this hydrology and surface water quality assessment include the prevailing rainfall characteristics for the project region and the physical setting at the watershed and local level, as these determine the existing and proposed surface drainage conditions in which the proposed project will be undertaken.

The Preliminary Hydrology Report and Preliminary WQMP are provided in the Appendices of this Draft EIR (**Appendix J.1** and **J.2**). Please consult the glossary of terms in this Draft EIR.

4.9.2 Existing Conditions

Relevant Principles in Hydrology, Stormwater Management, and Groundwater Management

Hydrology refers to the occurrence, distribution, and movement of surface water, including water found in rivers and stormwater drainage systems. Stormwater consists of runoff and surface drainage patterns in response to storm events that are determined by soil conditions, topography, and associated gradients of the land. Surface water quality refers to selected physical, chemical, or biological characteristics found

in drainage features in relation to an established standard. Groundwater is the water found underground in the voids in soil, sand, and rock. It is stored in and moves slowly through aquifers. Groundwater supplies are replenished, or recharged, by precipitation that seeps into the land's surface. In the Coachella Valley groundwater is also recharged by imported Colorado River water.

This section in part analyzes how the principles of hydrology and urban stormwater runoff management will be implemented as part of the proposed project to address the relevant thresholds of significance pertaining to hydrology and water quality.

The traditional process of urbanization and land development generally results in the conversion of a natural ground surface cover (pervious pre-development condition) into a setting with higher impervious characteristics, occurring through the introduction of buildings, hardscape, and pavement (post-development condition). Such development process typically results in a lower capacity to infiltrate stormwater runoff. Therefore, land development that is not regulated by hydrology and stormwater controls can potentially result in a post-development condition in which 1) total stormwater runoff volume increases, 2) the runoff conveyance occurs more rapidly, and 3) the peak discharge is greater. The increase in runoff volume results from the decrease in infiltration and storage. The shortened runoff conveyance time results from the greater flow velocities along impervious surfaces and drainage systems compared to a natural surface. The increase in peak discharge is the effect of larger runoff volume occurring over a shorter time compared to the pre-development condition. These effects, without engineering controls have the potential to result in degradation or modification to surface drainage, soil erosion and siltation, and water quality impairments.

However, regulatory mandates and engineering standards are inherently designed to prevent new development projects from being approved or carried out without demonstrating through various compliance plans the adequate controls for stormwater management, flooding, and impacts to local water resources.

Regional Hydrologic Conditions

The project is located in the Whitewater River Watershed, which is an arid desert region encompassing approximately 1,645 square miles. Within this watershed, an area of approximately 367 square miles (22 percent) encompassing most of the Coachella Valley region, is regulated under the established *Whitewater River Region Municipal Separate Storm Sewer System Permit* (MS4 Permit). The Riverside County Flood Control and Water Conservation District (RCFC&WCD), Coachella Valley Water District (CVWD) and the incorporated Coachella Valley cities, including the City of Palm Springs, have joint permittee responsibility for coordinating MS4 Permit compliance aimed at reducing potential pollutants in urban runoff.

Precipitation in the Whitewater River Region averages 3.6 inches per year. Climatic conditions in the Coachella Valley are characterized as "subtropical desert". When storms occur, they tend to be discrete

convective cells, and feature short but intense rainfall, typical of monsoonal thunderstorms; individual storm events typically are localized and rarely affect the entire drainage network.

The Whitewater River Region is drained primarily by the Whitewater River that flows to the Coachella Valley Stormwater Channel (CVSC) and outlets to the Salton Sea. Ephemeral tributary drainage to Whitewater River from the northern area of Palm Springs and portions of Desert Hot Springs include Garnet Wash, Mission Creek, and Little Morongo Creek-Morongo Wash. These drainage courses generally follow a south and southeastern direction into the Whitewater River. The project site is located between the tributary areas associated with Garnet Wash to the west, and Mission Creek to the east.

Regional and local stormwater management facilities are deemed to be part of the MS4 system. MS4 facilities include a system of conveyances (including roads catch basins, man-made channels, or storm drains).

Storm Event Criteria

This analysis includes various references to the one-hundred-year (100-year) storm event, primarily when denoting the requirements and basis for sizing the project's storm drain design and stormwater retention capacity. Based on the Federal Emergency Management Agency (FEMA) and United States Geological Survey (USGS) literature, the 100-year storm is a rainfall event, the intensity and duration of which has a reoccurrence interval (or probability of return) of 100 years, which is equivalent to a one-percent chance of being equaled or exceeded during any given year. The 100-year, or 1-percent storm event also determines the base flood conditions for purposes of FEMA flood zone designations, including those deemed to be at higher risk, like Special Flood Hazard Areas (SPHA). For hydrology purposes, the "controlling" 100-year storm event is one with the intensity and duration capable of generating the maximum stormwater volume or being the worst-case scenario as a basis for properly sizing the storm drain facilities, including inlets, pipes, outlets, and retention basins.

Chapter 8.70 (Stormwater Management and Discharge Controls) of the City's Municipal Code requires new projects to include retention facilities sized to contain the volume of stormwater runoff representing the difference between the existing (undeveloped) condition and the proposed (developed) condition resulting from the most conservative duration (1-hour, 3-hour, 6-hour, or 24-hour) 100-year storm (hereafter defined as the "project storm"). This volume of stormwater runoff that must be retained is defined as the "incremental volume of stormwater runoff". The actual quantity of stormwater incremental increase is determined by hydrologic calculations specific to the project location, size, and site plan conditions.

Local Hydrologic Conditions

The project site consists of undeveloped and relatively level terrain, with sparse vegetation coverage on visibly uniform sandy soils intermixed with small to medium-sized boulders. The site elevation has a

gentle gradient of approximately 1.3 percent from northwest to southeast. The site is absent of any formal structures or storm drainage improvements.

In terms of surrounding uses, land directly to the north is vacant with similar terrain and gradient conditions as those found on the project site. Land to the east includes North Indian Canyon Drive, followed by the Coachillin' Business Park within walled limits. Land to the south includes 19th Avenue, followed by a storage facility, and industrial properties at a relatively lower elevation. Land to the west is flat terrain enclosed within fencing.

The United States Department of Agriculture (USDA), Natural Resources Conservation Service, is responsible for categorizing and grouping soil conditions relevant to hydrologic factors and estimates of runoff potential. Based on the USDA Natural Resources Conservation Service Web Soil Survey, the project site is underlain by three soil units: Carsitas fine sand (CkB), Carsitas gravelly sand (CdC), and Carsitas cobbly sand (ChC). All three soils have a soil classification corresponding to hydrologic soil group A, which is characterized by having a high infiltration rate and low runoff potential. These soils typically consist of deep, well drained sands or gravelly sands and have a high rate of water transmission.

Water Supply

The project site is located within the Mission Springs Water District (MSWD) service area, which provides water services to over 13,500 retail water customers in the northern portion of Palm Springs and City of Desert Hot Springs. MSWD is one of the six urban water suppliers in the Coachella Valley, also including Coachella Valley Water District (CVWD), Coachella Water Authority (CWA), Desert Water Agency (DWA), Indio Water Authority (IWA), and Myoma Dunes Mutual Water Company. These suppliers collaborate on the planning and implementation of water resource management, conservation, and contingency programs. The subject property is underlain by the Indio Subbasin (Basin No. 7-021.01), but it is close to the border with the Mission Creek Subbasin, located to the north.

Groundwater Resources

California's Groundwater Update 2020 (Bulletin 118), completed in November of 2021 by the California Department of Water Resources, is the State's most current compendium of Statewide data and information on groundwater resources and management. According to the Department's Basin Boundaries Data Viewer, the project site is underlain by the Garnet Hill Subarea of the Indio Subbasin (Basin No. 7-021.01), which is a subarea generally confined by the Banning Fault to the north and Garnet Hill Fault to the south. The mapped northern limit of the Garnet Hill Subarea and Indio Subbasin is located approximately 800 feet north of the project boundary, beyond which is the Mission Creek Subbasin.

Water service to the project site is provided by Mission Springs Water District (MSWD), which relies on well sites and groundwater resources from the Mission Creek Subbasin. The project site is located within

the Planning Area of the Mission Creek Subbasin Alternative Update, completed in November of 2021 in compliance with the Sustainable Groundwater Management Act (SGMA).

The Indio, Mission Creek, Desert Hot Springs, and San Gorgonio subbasins make up the greater Coachella Valley groundwater basin) as the groundwater source for the project region. Based on a 1964 estimate by DWR, the Coachella Valley groundwater basin has an approximate storage capacity of 39.2 million acre-feet (AF) of water within the upper 1,000 feet. In 1964, DWR estimated that the Indio Subbasin contained approximately 29.8 million AF of water in the first 1,000 feet below the ground surface, or approximately 76 percent of the total groundwater in the Coachella Valley Groundwater Basin.

The Mission Creek Subbasin is described as an unconfined aquifer with a saturated thickness of 1,200 feet or more and an estimated total storage capacity on the order of 2.6 million AF. The subbasin is naturally recharged by surface and subsurface flow from the Mission Creek, Dry, and Big Morongo Washes, the Painted Hills, and surrounding mountain drainages. Artificial replenishment is achieved through the exchange of State Water Project (SWP) water for Colorado River water at the Mission Creek Groundwater Replenishment Facility (GRF), located approximately 5 miles northwest of the project. In 2020, a total of 1,768 AF of Colorado River water was delivered to the Mission Creek GRF for direct replenishment. Since 2003, groundwater levels have risen and stabilized throughout the subbasin, effectively eliminating the overdraft that preceded it. Currently, groundwater levels in the basin are above their 2009 levels in nearly all monitoring wells that have available groundwater level data for comparison.

4.9.3 Regulatory Setting

Federal

Federal Clean Water Act

The Clean Water Act (CWA) of 1972 was enacted to restore and maintain the chemical, physical, and biological integrity of the nation's waters by regulating the discharge of pollutants to waters of the U.S. from point sources. As part of the National Pollutant Discharge Elimination System (NPDES) program, subsequent amendments to the CWA established a framework for regulating non-point source discharges from urban land runoff and other diffuse sources that were also found to contribute to runoff pollution. Under CWA, the Environmental Protection Agency (EPA) delegated the NPDES permit program to various state, tribal, and territorial governments, enabling them to perform many of the permitting, administrative, and enforcement aspects of the program. California is a delegated NPDES state and has authority to administer the NPDES program within its limits. The pertinent sections of the CWA regulatory structure are summarized below:

Section 102 requires the planning agency of each state to prepare a basin plan to set forth regulatory requirements for protection of surface water quality, including designated beneficial uses for surface waterbodies, and specified water quality objectives to protect those uses.

Section 303(d) requires each state to provide a list of impaired surface waters that do not meet or are expected not to meet state water quality standards as defined by that section.

Section 402 requires that all point-source discharges, including but not limited to, construction-related runoff discharges to surface waters and some post-development dischargers, be regulated through the NPDES program. Project sponsors must obtain an NPDES permit from the State Water Resources Control Board (SWRCB).

National Flood Insurance Program

The Federal Emergency Management Agency (FEMA) Flood Insurance Rate Maps (FIRMs) serve as the basis for identifying potential hazards and determining the need for and availability of federal flood insurance. As mandated by the National Flood Insurance Act of 1968 and the Flood Disaster Protection Act of 1973, FEMA administers the National Flood Insurance Program (NFIP) to provide subsidized federal flood insurance to residents of communities where future floodplain development is regulated. FEMA has developed FIRMS to determine the need for and availability of federal flood insurance. FIRM maps rely on a variety of flood risk information based on historic, meteorological, hydrologic and hydraulic data, as well as existing development, open space and topographic conditions within an area. FEMA mapping also incorporates the results of engineering studies to delineate Special Flood Hazard Areas (SFHAs), which are considered at higher risk of inundation and flood-related hazards.

State and Local

Porter-Cologne Water Quality Control Act

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

To regulate and protect water quality pursuant to NPDES and to exercise rulemaking and regulatory activities, the Porter-Cologne Act established the SWRCB and nine California Regional Water Quality

Control Boards (RWQCBs). The Project site and Coachella Valley are located within Region 7, Colorado River Basin Regional Water Quality Control Board.

Another mechanism of the Porter-Cologne Act is the requirement to adopt water quality control plans containing the guiding policies of water pollution management in the state. Under this framework, the Colorado River Basin Water Quality Control Plan (Basin Plan) serves as the applicable document prepared, adopted, and maintained to identify the existing and potential beneficial uses of waters of the State and establish water quality objectives to protect these uses. The Basin Plan is the guiding document that outlines the Colorado River Basin Regional Water Quality Control Board's plan for preserving and enhancing water quality in the region for the protection of beneficial uses for present and future generations.

NPDES Stormwater General Permit for Construction Activities

Under the federal CWA, discharges of stormwater from construction sites must comply with the conditions of a NPDES permit. The SWRCB has adopted the Construction General Permit that applies to projects resulting in 1 or more acres of soil disturbance. These requirements occur under the state's most current Construction General Permit (CGP), Stormwater General Permit Order WQ 2022-0057-DWQ (2022 CGP), effective September 1, 2023. Compliance with the CGP involves the development and implementation of a project-specific Storm Water Pollution Prevention Plan (SWPPP), designed to prevent potential adverse impacts to surface water quality, including erosion and siltation, during the period of construction. As applicable, the SWPPP is required to provide limits of temporary disturbance and will indicate the specific locations where storm water Best Management Practices (BMPs) will be implemented. Storm water BMPs refer to a schedule of activities, prohibitions of practices, maintenance procedures, and other management practices to prevent, eliminate, or reduce the pollution of receiving waters. BMPs are standardized in a handbook made available by the California Stormwater Quality Association (CASQA).

Whitewater River Watershed Municipal Separate Storm Sewer System

In 1987, Congress amended the Federal Clean Water Act (CWA) to require public agencies which serve urbanized areas with a population greater than 100,000 to obtain permits to discharge urban stormwater runoff from municipally owned drainage facilities including streets, highways, storm drains and flood control channels. In November 1990, the EPA promulgated enforceable regulations establishing MS4 Permit requirements under its NPDES Program.

The Whitewater River Region MS4 Permit applies to an area of approximately 367 square miles, which generally corresponds to the urbanized portions of the watershed in the Coachella Valley. The MS4 Permit compliance programs are administered by Riverside County Flood Control and Water Conservation District, (RCFC&WCD,) CVWD, and the incorporated Coachella Valley cities, including Palm Springs.

Regional Water Plans

MSWD provides water services to over 13,500 retail water customers in the City of Desert Hot Springs and a northern portion of Palm Springs. In 2019, the six urban water suppliers in the Coachella Valley, prepared a 2020 Coachella Valley Regional Urban Water Management Plan (2020 RUWMP) with regional and individual agency content. The 2020 RUWMP describes the region's water supplies and anticipated demands through 2045. It also describes each agency's programs to encourage efficient water use. A Water Shortage Contingency Plan (WSCP) has also been prepared to outline each agency's actions during a water shortage to reduce demands. The agencies have coordinated their WSCPs to provide consistent response actions across the region.

The Mission Creek Subbasin Alternative Plan Update was prepared to ensure that the most current projections for population growth, land use, imported water supply, and other future conditions were incorporated into water management planning for the region.

Palm Springs Master Drainage Plan

The project site and a majority of the City of Palm Springs are located in Zone 6 of the Riverside County Flood Control and Conservation District's (RCFC) jurisdiction. Zone 6 covers the western portion of the Coachella Valley and the eastern portion of the pass area, including Banning, Palm Springs, Desert Hot Springs and portions of Cathedral City and the unincorporated County. The Plan was adopted in 1982 along with expanded acreage drainage fees imposed on new development to fund improvements.

Since the master drainage plan adoption, the City has implemented on-site retention as a requirement under Chapter 8.70 of the Palm Springs Municipal Code. New development is not permitted to drain into an approved drainage without first meeting the on-site retention requirement and demonstrating that the discharged stormwater will not adversely impact downstream properties.

The project site is located to the north and outside of the Palm Springs Mater Drainage Plan but is subject to the on-site retention requirements. Moreover, the project site is also located to the east and outside of the Master Plan for Flood Control and Drainage, Garnet Wash and Tributaries, dated February 1963, also for Zone 6. Being located outside of approved Master Drainage Plans, the project is not deemed to be subject to the respective requirements. Rather, the project is subject to the on-site retention requirements for incremental increase in runoff.

City of Palm Springs General Plan

The City of Palm Springs General Plan considers the health, safety, and welfare of the community as a fundamental issue and in response, identifies goals and policies to reduce the risk of hazards, including erosion and sedimentation, flooding, dam inundation, and seiche potential as the most relevant topics to hydrology and water quality. The relevant policies from the Safety Element of the General Plan are listed below.

Policy SA2.11 - Protect slopes from the effects of erosion by directing surface water away from slope faces and planting slopes with drought-resistant, ground-covering vegetation.

Policy SA2.12 - Adequately set back developments that are adjacent to natural drainage channels to protect them from eroding channel banks, or modify the channel to reduce the potential impacts created by erosion.

Policy SA2.16 - Provide protection for roadways and utility lines from erosion and sedimentation.

Policy SA2.17 - Encourage the incorporation of wind barriers, architectural design or features, and drought-resistant ground coverage in new development site designs to mitigate the impacts from erosion and windblown sand.

Policy SA3.1 - Provide appropriate land use regulations and site-development standards for areas subject to flooding.

Policy SA3.2 - Evaluate all development proposals located in areas that are subject to flooding to minimize the exposure of life and property to potential flood risks.

Policy SA3.3 - Require that future planning for new development consider the impact on flooding potential as well as the impact of flood control structures on the environment, both locally and regionally.

Policy SA3.7 - Provide direction and guidelines for the development of on- site stormwater retention facilities consistent with local and regional drainage plans and community design standards.

City of Palm Springs Municipal Code and Engineering Standards

Chapter 8.70: Stormwater Management and Discharge Controls

The intent of this chapter is to ensure the future health, safety, and general welfare of residents by: 1) regulating non-stormwater discharges to the municipal storm drain; 2) controlling the discharge to municipal storm drains from spills, dumping or disposal of materials other than stormwater; and; 3) reducing pollutants in stormwater discharged to the maximum extent practicable. This chapter also intends to protect and enhance the water quality of city watercourses, water bodies, ground water and wetlands in a manner consistent with the Federal Clean Water Act and the Porter-Cologne Water Quality Control Act.

When required by the City Engineer, the applicant of new development must submit hydrology and hydraulic calculations, and drainage area maps to the City, to determine the quantity of stormwater runoff generated by a site or tributary to it, as well as its effects on the site, and to upstream or downstream properties.

4.9.4 Project Impact Analysis

Thresholds of Significance

The following standards and criteria have been drawn from Appendix G: Environmental Checklist Form of the CEQA Guidelines. Development of the project site would have a significant effect on hydrology and water quality if it is determined that the project would:

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?

Methodology

Proposed Hydrologic Conditions and Stormwater Infrastructure

The relevant findings throughout this section rely in part on Palm Springs Fulfillment Center Preliminary Hydrology Report, Preliminary Water Quality Management Plan, and Preliminary Grading Plan. Based on the existing conditions and the most conservative configuration of impervious land cover, the Preliminary Hydrology Report determined tributary areas to calculate the necessary stormwater management controls and their capacities to comply with the City's engineering standards and requirements.

This analysis includes various references to the one-hundred-year (100-year) storm event, primarily when denoting the requirements and basis for sizing the project's storm drain design and stormwater retention capacity. The "controlling" 100-year storm event is one with the intensity and duration capable of generating the maximum stormwater volume. As a standard method, the Preliminary Hydrology Report calculates project runoff quantities using various input factors, including the precipitation frequency,

duration, and depth (in inches) obtained from the National Oceanic and Atmospheric Administration Atlas 14 (NOAA Atlas 14) for the project location. The Preliminary Hydrology Report analysis indicates that the 100-year 6-hour storm is the storm duration capable of producing the highest quantity of runoff for the project location and scope of development. This storm is equivalent to approximately 3.16 inches of rain within the 6-hour period. The precipitation factors from NOAA Atlas 14 and the resulting runoff modeling serves as the basis for adequately sizing the storm drain facilities, including inlets, pipes, outlets, and retention basins. The delineation of drainage management areas for the project is determined by the engineering plans, including grading and hydrology, whereby developed ground surfaces are designed and constructed to convey tributary runoff along dedicated surface, piped, and/or channelized flow patterns within a contained area. Tributary surfaces within a drainage area include building roof drains, pavement, hardscape, and landscaping. Drainage areas function like watersheds at the smaller scale of the development, with the boundaries being defined by high points, barrier curb, and other constructed grade differentials to separate the storm drainage systems (inlets, pipes, and retention facilities) and to control runoff within a specified management area.

The proposed development is divided into two on-site drainage management areas ("A" and "B"). Drainage Area "A" includes the northernmost 6.980 acres with a conservative post-development impervious coverage of approximately 90% for hardscape and paving improvements. Based on the *Whitewater Watershed BMP Design Volume Worksheet*, the V_{BMP} for Drainage Area A is 7,397 cubic feet. Runoff from Drainage A will be conveyed to a dedicated underground retention structure that is designed to provide approximately 51,371 cubic feet of storage to handle the entirety of the flood volume resulting from the controlling 100-year, 24-hour storm event and the V_{BMP} quantity that is considered first-flush and is therefore known to carry a higher concentration of debris and potential runoff pollutants. The underground retention structure will consist of 60-inch-diameter corrugated metal pipe (CMP) wrapped with crushed rock and non-woven geotextile fabric, located north of the building, at the transition between the paved driveway and the loading area.

Drainage Area "B" includes the remaining 29.140 acres with a conservative post-development impervious coverage of 90% for the building, hardscape, and paving improvements. Based on the *Whitewater Watershed BMP Design Volume Worksheet*, the V_{BMP} for Drainage Area B is approximately 30,908 cubic feet. Runoff from Drainage B will be conveyed via surface flows consisting of driveways, gutters, and inlets connected to retention facilities located south of the building, with a combined capacity to retain the entirety of the flood volume resulting from the controlling 100-year, 24-hour storm event and the V_{BMP}.

The proposed retention sizing of 246,048 cubic feet will be provided via a proposed surface retention basin with a capacity of approximately 108,883 cubic feet and an underground retention structure with a capacity of approximately 137,165 cubic feet, consisting of 60-inch-diameter CMP wrapped with crushed rock and non-woven geotextile fabric. The combined retention capacity for Drainage Area "B" is sized according to the City's on-site retention standard, therefore, this capacity is greater than the

smaller VBMP quantity generally considered first-flush. Runoff from the project would reach the underground facility first before filling the surface basin after reaching its capacity. The surface and underground retention facilities will work as a single system to serve Drainage Area "B".

Table 4.9-1 below summarizes the drainage area calculations and corresponding retention volumes accounted for in the Preliminary Hydrology Report. By providing project-wide retention sizing for the entirety of the 100-year storm volume, the project provides capacity that exceeds the requirement for incremental increase and includes a safety factor or freeboard.

Table 4.9-1 Summary of Drainage Management Areas and Retention Capacities

Drainage Management Area ID	On-Site Tributary Area (Acres)	Stormwater Runoff Volume Resulting from the Controlling 100-Year Storm Event	Provided Retention Capacity (Cubic Feet)	Method of Retention
DA-A	6.98 AC.	51,245	51,371 CF	Underground
DA-B	29.14 AC.	246,084	246,048 CF	Surface and Underground
Total Hydrologic Area	36.12 AC.	297,329	297,419 CF	See Above

Project Impacts

a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

As defined in Section 13374 of the CWC, the term "Waste Discharge Requirements" (WDRs) is a process involving general permits to regulate similar groups or activities, such as construction or municipal, or individual permits to regulate specific owners, operators or facilities. As discussed below, the relevant WDRs to the project occur in the form of general permits applicable during construction implementation and after construction as part of the MS4 water quality requirements. Compliance with WDRs is therefore achieved through the appropriate permit registration process under the applicable NPDES programs described below.

Construction Phase Storm Water Pollution Prevention Plan

During the period of construction, compliance with waste discharge requirements will be achieved through the permit registration and coverage process under the *NPDES General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities*, known as the Construction General Permit (2022 CGP), applicable to any construction or demolition that results in a land disturbance equal to or greater than one acre. The proposed project's 38 acres of disturbance triggers the CGP coverage requirement and the associated plan implementation process. As a requirement of law, the project's permit registration process, associated compliance plans, and implementation measures are not considered mitigation.

The proposed grading and construction activities necessary to implement the project have the potential to result in temporary instances of localized erosion and sedimentation, if the construction conditions are not controlled. Compliance with the CGP requires the development and implementation of a project specific Storm Water Pollution Prevention Plan (SWPPP), to prevent potential adverse impacts to surface water quality during the entire period of construction and for all disturbed land surface areas, including those associated with site preparation, mobilization, grading, and vertical construction activities through completion and final stabilization.

The SWPPP is required to identify a strategy of stormwater Best Management Practices (BMP)s. Stormwater BMPs must prevent, eliminate, or reduce the pollution of the receiving waters, primarily focused on preventing erosion, siltation, illicit discharge, and contamination to downstream facilities. In the case of the proposed project, BMPs will be established in the SWPPP, and consistent with the WQMP will include such measures as storm drain inlet protection, erosion control, perimeter and onsite runoff control including linear sediment barriers, waste management, and material storage. The SWPPP must be prepared concurrently with final engineering design as a requirement of the City's grading permit checklist. Compliance with the State's CGP during construction is regulated and enforced as part of the Colorado River Regional Water Quality Control Board (RWQCB Region 7) inspection and audit authority under Section 13267 of the Porter-Cologne Water Quality Control Act. The City of Palm Springs will also provide enforcement oversight through its MS4 implementation.

During all stages of construction, the project will also be required to comply with South Coast Air Quality Management District's (SCAQMD) Rule 403 and 403.1 and the City's Fugitive Dust Control Ordinance. Implementation of Fugitive Dust Control Plans primarily pertains to air quality, but also supports water quality protection through the requirements for soil stabilization practices aimed at preventing sediment erosion and track-out. The project's dust control plan will include specific measures, such as stabilized construction entrances/exit points equipped with gravel pads and track-out plates, daily maintenance, watering or an EPA approved soil binding agent treatment of disturbed areas. The enforcement of dust control plan implementation, including verification that the field actions are consistent with the City-approved plans, is performed by South Coast AQMD and by the City of Palm Springs. The concurrent implementation of the required SWPPP and Dust Control Plan will establish measures to prevent potential construction-related impacts to surface water quality, including instances of erosion and siltation, at the site and its surroundings.

Therefore, during the period of construction, less than significant impacts are anticipated pertaining to violations of any water quality standards, waste discharge requirements, or degradation of surface or ground water quality.

Post-Construction Water Quality Management Plan

During the life of the project, water quality standards and waste discharge requirements will be met through compliance with the NPDES permit program for post-construction conditions. As described

above, the project is required to develop and implement a project-specific Water Quality Management Plan (WQMP) for both construction and long-term maintenance.

The project WQMP addresses post construction stormwater runoff quantity and quality requirements by implementing proposed storm drain and infiltration facilities with a mandated operation and maintenance program to meet the Low Impact Development (LID) Site Design criteria. Retention facilities will consist of surface basin and underground systems. The basin facilities will be stabilized with approved landscaping. The overall maintenance of the private storm drain and retention systems will be covered by the Operation and Maintenance (O&M) section of the Final WQMP and subject to a site-specific Stormwater Management/BMP Facilities Agreement (WQMP Agreement) with the City of Palm Springs. The O&M section of the WQMP describes the implementation, inspection, maintenance and frequency guidelines for measures which could include education for property owners and operators; activity restrictions; common area landscape management and efficient landscape design; common area litter control; contractor/employee training; common area catch basin inspection; street sweeping of private streets and parking lots; storm drain system stenciling and signage; trash and waste storage areas to reduce pollutant introduction. The WQMP Agreement establishes the owner or operator's responsibility to maintain the said facilities in accordance with the approved WQMP, also allowing for City entry for inspection and enforcement as necessary. The WQMP Agreement is signed by the owner/operator and City representatives before recordation against the property.

The use of stormwater retention facilities in conformance with local retention requirements meets 100 percent of the LID and Site Design measurable requirements under the MS4 permit. Concurrent with the hydrology report, grading, and engineering improvement plans, the WQMP will be subject to review and approval by the City engineer prior to the issuance of a grading permit.

In summary, during construction and operation, the proposed development will be required to comply with CWA, NPDES, state, and local regulations to prevent violations or impacts to surface water quality standards and waste discharge requirements. Impacts are less than significant.

b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin

The project site is located within the domestic water service area of Mission Springs Water District (MSWD), which is said to provide water services to over 13,500 retail water customers in the northern portion of Palm Springs and City of Desert Hot Springs. The project site is underlain by the Garnet Hill Subarea of the Indio Subbasin, but water services by MSWD to the site are sourced from the Mission Creek Subbasin, which is described as an unconfined aquifer with a saturated thickness of 1,200 feet or more and an estimated total storage capacity of 2.6 million AF.

The Project will rely on groundwater resources as a source of domestic and construction water supplies.

Groundwater Supply

A Water Supply Assessment and Water Supply Verification (WSA/WSV) for the proposed project was prepared in October of 2023, and approved by MSWD on November 20, 2023, in order to document the sufficiency of the local water supply to meet the demand of the proposed project (**Appendix M**). Accounting for the land uses and outdoor landscaping, the WSA/WSV findings determined that the total projected water demand for the project is 118.37 acre-feet per year (AFY). This WSA demonstrates that sufficient water supplies exist, or will exist based on current water planning assumptions, to meet the projected demands of the Project, in addition to current and future projected water demands within MSWD's service area in normal, single-dry, and multiple-dry years over a 20-year projection. This WSA will be reviewed every five years, or if water planning assumptions change, until the Project begins construction to ensure it remains accurate and no significant changes to either the Project or available water supply has occurred. The analysis, conditions, and information mandated in the WSA for MSWD approval supports the finding that the project will not substantially decrease groundwater supplies or impede sustainable groundwater management of the basin. Additional analysis of the WSA/WSV is provided in **Section 4.15, *Utilities and Service Systems***.

As demonstrated in the WSA and the analysis above, the project will have less than significant impacts on groundwater supply or recharge.

Groundwater Quality

Existing natural groundwater treatment (infiltration) will be protected from urban runoff created by the proposed project through operational source controls as part of the Final WQMP requirements and scope. Source control measures reduce the potential for urban runoff and pollutants from coming into contact with one another. Measures include activity schedules, prohibitions of practices, pavement sweeping, facility maintenance, detection and elimination of illicit connections/illicit discharges, and other activities that will be applicable during the life of the project. Other than parking, the project does not have outdoor facilities or activities that have a potential to become a source of pollution. As part of the Final WQMP and engineering design, the proposed storm drain inlets connected to retention facilities can be equipped with filter systems designed to capture trash, debris, and hydrocarbons prior to entering the respective retention facilities.

The Preliminary WQMP includes non-structural and structural source controls to prevent pollutants from entering the storm drain system and impacting groundwater. Non-structural source control measures consist of site operations, activities, and/or programs described above to prevent potential pollutants from being produced, coming into contact with the storm drain system, and impacting groundwater. Structural source control measures consist of facility design standards to prevent direct contact between potential pollutants and stormwater runoff. The required structural source control measures include:

1) Storm drain inlet stenciling and signage at each storm drain inlet with a brief statement prohibiting dumping of improper non-stormwater materials into the storm drain system.

2) Landscape and irrigation system design involving water efficient fixtures and associated maintenance to prevent nuisance runoff.

3) Retention basin slope protection via routine inspection and maintenance of the facility groundcover.

4) Properly maintained trash enclosures and bins to prevent improper handling and disposal in common areas.

The required non-structural and structural source control measures, including associated maintenance, will be applicable during the life of the project. The Project is therefore not expected to violate or interfere with groundwater quality, and less than significant impacts are anticipated.

Groundwater Recharge

The project is not located on or near any designated groundwater recharge facility. The nearest facility is the Whitewater River Groundwater Replenishment site, located within the City of Palm Springs limits, approximately 1.25 miles to the southwest. The said replenishment infrastructure, operated by CVWD, includes a system of 19 infiltration ponds, various spillways, dikes, and conveyance channels on approximately 690 acres. Designated water intake to this facility occurs from controlled imported water deliveries, natural runoff (snow melt) and stormwater flows from the northwest. The project site does not have an existing surface drainage pattern connected to the replenishment ponds. Therefore, the project location would not occupy, encroach, or otherwise interfere with the function or capacity of the existing conveyance or infiltration pond infrastructure of the Whitewater River Groundwater Replenishment Facility.

The proposed project would convert the site from a pervious to a mostly impervious condition through the introduction of structures, hardscape, and asphalt cover. The proposed private storm drain system will capture, convey and infiltrate the entire project runoff volume resulting from the most conservative 100-year storm event, in accordance with the City's Engineering Standards. Infiltration is a form of on-site recharge that is favored over an urban runoff discharge condition. As a result, the project location and stormwater management will not interfere with the local or regional groundwater recharge trends. Less than significant impacts are anticipated pertaining to interference with groundwater recharge.

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:

c.i. Result in substantial erosion or siltation on- or off-site

The existing condition of the project site consists of undeveloped land with a relatively level terrain and sparse vegetation coverage on visibly uniform sandy soils intermixed with small to medium-sized boulders. The site is not in a FEMA-designated special flood hazard area. Within the project area, the

proposed land uses will result in an increase in impervious land cover through the introduction of structures, hardscape and streets conservatively making up about 90 percent of the site. However, as described above, the City's engineering standards require that the project incorporate on-site infrastructure to intercept, convey, and retain stormwater runoff resulting from the 100-year storm event. The retention basins will include energy dissipation, which provides effective erosion control, as required by the City's Engineering Standards. Each component of the storm drain system that comes into operation will be subject to maintenance measures during the life of the project to ensure effectiveness. The on-site pervious areas of the project will be stabilized in accordance with approved landscaping plans.

The approved WQMP will prevent the release of runoff on site and onto neighboring properties during a 100 year storm, and will prevent off-site siltation and erosion impacts. Only runoff in excess of the controlling 100-year storm event will be allowed to overflow into the surrounding streets in a manner consistent with the existing drainage patterns. All on-site impervious and pervious land cover resulting from project implementation, including the storm drain system and retention facilities, will be subject to approved and monitored operation and maintenance during the life of the project, as mandated by a Final WQMP agreement that will be required of this project prior to issuance of a grading permit. Therefore, less than significant impacts are expected pertaining to substantial erosion or siltation, on- or off-site.

c.ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;

The Federal Emergency Management Agency (FEMA) Flood Insurance Rate Maps (FIRMs) serve as the basis for identifying potential hazards and determining the need for and availability of federal flood insurance. Based on FEMA FIRM Panel 06065C0895G, (August 28, 2008), the entire project site is located within Zone X, corresponding to areas subject to the 0.2 percent annual chance for flood hazard. The designation of Zone X is not considered a SFHA or floodway. Furthermore, this flood zone is considered to be a moderate-to-low risk area where flood insurance is available, but not mandatory.

The Preliminary Hydrology Report has calculated that the stormwater runoff volume resulting from the worst-case 100-year storm event for the project would be approximately 297,329 cubic feet, as shown in **Table 4.9-1** above. The retention capacity is distributed among a system of facilities, rather than a single location, in order to prevent concentrated flows and volumes, while facilitating the effectiveness of these facilities after construction. The on-site well-drained soils will facilitate drawdown of the volume. The final volume and retention capacity will be subject to final review and approval by the City prior to project implementation. As a standard requirement, the project is obligated to meet the City of Palm Springs' requirements by demonstrating that the incremental increase in runoff due to development can be adequately retained on-site. The project provides facilities to retain the entirety of the controlling 100-year, 24-hour storm event, therefore adequately meeting or exceeding the City of

Palm Springs stormwater retention ordinance. As a result, the project will not result in off-site discharges of urban runoff within the design condition. Only runoff quantities resulting from a larger magnitude storm event, such as a force majeure or natural disaster event beyond the City's engineering standards, would be allowed to be conveyed off-site.

The proposed storm drainage and flood control improvements are not expected to substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site. Therefore, the impact is less than significant.

c.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;

As previously introduced, the undeveloped project property is located outside of the Palm Springs Master Drainage Plan. The site and immediate surroundings lack formal storm drainage infrastructure. There are no planned facilities to which the project could connect. Therefore, the project has been designed to retain its storm flows on-site.

The proposed project will include private on-site storm drain facilities to capture and retain the entire runoff volume resulting from the developed condition from the 100-year storm event. Based on the Preliminary Hydrology Report, the expected quantity of retention capacity is approximately 297,419 cubic feet, which will meet the calculated runoff volume of 297,329 feet to be produced by the project. The method of retention will be a combination of surface basins and underground storage, which are commonly used approaches implemented throughout the City.

This approach is required by the City when public drainage facilities do not exist, and will require approval by the City Engineer.

The on-site retention system will prevent pollution of and by project area runoff in accordance with an approved WQMP, preventing uncontrolled release into any public MS4 facilities. The proposed on-site retention system capacity, with free board as a required form of safety factor, is sized to contain the project's stormwater runoff resulting from the worst-case 100-year storm event.

The project will provide the required on-site storm drainage system with on-site retention to meet the City's engineering standards, in the absence of public drainage facilities in the area. The on-site retention facilities will prevent the project from discharging uncontrolled storm flows onto surrounding properties.

Based on the proposed storm drain design, the project will not result in stormwater runoff conditions which would impact the City's existing MS4 capacity, 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. Impacts are expected to be less than significant.

c.iv. Impede or redirect flood flows?

The undeveloped project site is not located within a FEMA-designated SFHA. The elevation gradient in the project vicinity results in a prevailing north-to-south drainage pattern. The USGS 7.5-Minute Topographic Map for Desert Hot Springs, published in 2021, does not display any geologic or hydrologic features on the project site. Moreover, the existing soils on the project site and neighboring land to the north are classified as being part of hydrologic soil group A with high infiltration capacity and low runoff potential. These soils consist of deep, well drained sands or gravelly sands and have a high rate of water transmission. Therefore, flood flows are not known to be present on or around the project site, such that impedance, obstruction, or redirection would result from project implementation. Based on preliminary engineering plans, the westerly and northerly project boundaries of the project will be improved with a retaining wall with fencing on top. The retaining wall will control the differential between the project's finished elevation that will be relatively lower than the undeveloped neighboring land to the west and north. The proposed retaining wall is required to provide a lip or height difference in relation to the adjoining land to prevent potential sheet flow from freely draining over the retaining wall. As a result, off-site sheet flow that is not infiltrated on the adjoining properties will interface with a controlled retaining wall condition to be conveyed easterly along the north edge and southerly along the west edge.

Within the project site, the preliminary grading and hydrology plans have established the exterior gradients and cross-gradients with a range of approximately 0.3 to 5 percent on finished surfaces to conform with circulation, drainage, and accessibility parameters. The building's finished floor elevation is designed to be flat and raised relative to the surrounding asphalt surfaces. The parking lot and driveway finished surface elevation will be 787 feet at the north-end and 771 feet at the south-end. Accounting for the distance (run) of approximately 1,223 feet between these edges, the prevailing gradient will be approximately 1.3 percent in the developed condition, which is equivalent and consistent to the existing undeveloped trend. On-site runoff will be conveyed along the described surfaces toward inlets connected to retention facilities for each of the two drainage areas. At the south-end, which represents the lowest elevation, the proposed linear retention basin north of 19th Avenue will have a depth of 3 feet, 3-to-1 side slopes, and a flat basin bottom (no cross gradient) to prevent a concentrated overflow condition after the capacity is exceeded. As a result, the developed condition will not result in a concentrated runoff discharge condition capable of impacting downstream streets and properties. The final drainage conditions will be determined by the final precise grading and hydrology plans.

The proposed development would contain urban runoff within on-site drainage management areas. Runoff conveyance into the designated retention facilities will be facilitated via sheet, gutter, and piped flows in a manner that is consistent with the gentle elevation gradient. Surrounding vacant areas subject to future development will be expected to include the required drainage controls for the respective land uses, independent of the proposed project. Less than significant impacts are anticipated.

d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation

Based on the most current Federal Emergency Management Agency (FEMA) FIRM Panel 06065C0895G, the entire project site is located within Zone X, corresponding to areas subject to the 0.2 percent annual chance flood hazard. The designation of Zone X is not considered a SFHA or floodway. No impact will occur.

Tsunami: The project is located approximately 67 miles from the nearest coastal areas and therefore is not prone to tsunami hazards. No impacts will occur.

Seiche Zone: A seiche is primarily defined by free or standing wave oscillations on the surface of water, the causes of which may be wind, atmospheric changes, or seismic activity. The project site is not located in a mapped seiche zone, nor is it located near a large body of water that would pose an unmapped risk. The proposed retention basins include the required free board to protect on-site structures and facilities. Less than significant impacts will occur.

Risk Release of Pollutants: Due to the BMPs incorporated into the Project design through the WQMP and the site's location outside a flood zone, the proposed facilities are not expected to result in any pollutant release in the event of inundation. Therefore, the impact is less than significant.

e. Conflict or obstruct implementation of a water quality control plan or sustainable groundwater management plan

As discussed above, the project proponent is required to implement a project-specific WQMP to comply with the most current standards of the Whitewater River Region Water Quality Management Plan for Urban Runoff, Whitewater River Watershed MS4 Permit. The WQMP, as described above, includes guidelines for facility maintenance and other operations aimed at complying with local surface water quality requirements. The WQMP will document the source controls, and treatment controls with a required operation and maintenance program to comply with water quality objectives. Moreover, the project's stormwater retention facilities will ensure that urban runoff is recharged into the ground via infiltration.

The findings of the WSA/WSV determined that there will be sufficient water supplies to meet the demands of the proposed project, and future demands of the project, plus all forecasted demands in the next 20 years. This is based on the volume of water available in the aquifer, Colorado River contract supply, water rights and water supply contracts. The groundwater basin has a storage capacity of approximately 28.8 million AF, simulating the benefit of a very large reservoir and is capable of meeting the water demands of the Coachella Valley for extended normal and drought periods. As such, project implementation is not expected to conflict with the Indio Subbasin Sustainable Groundwater Management Plan from the aspect of on-site stormwater capture, retention, and source controls for groundwater quality.

Less than significant impacts are anticipated to water quality control plan or sustainable groundwater management plan.

4.9.5 Cumulative Impacts

Project implementation will result in physical changes to the undeveloped project setting through grading and permanent construction improvements with on-site storm drainage facilities designed to serve the proposed development. The proposed project will be required to implement stormwater management through the implementation of an NPDES permit and City engineering standards. Water use will comply with MSWD and City efficiency requirements.

Cumulative impacts would occur when existing development, the proposed project and future development allowed by the General Plan combine to create water quality and flooding hazards. However, the City implements the same requirements for water quality management and on-site retention for all projects, in order to prevent cumulative hydrology impacts. Therefore, because of the standards implemented by the City, MSWD and other responsible agencies, cumulative impacts associated with hydrology and water quality will remain less than significant for the cumulative projects because all such projects would be subject to the City's retention policy and associated engineering requirements for stormwater management. As result, project implementation would not cause a cumulatively considerable impact pertaining to hydrology and water quality.

4.9.6 Mitigation Measures

No mitigation measures are required.

4.9.7 Level of Significance After Mitigation

No significant impacts have been identified and no mitigation measures are necessary.

4.9.8 Resources

1. Palm Springs Fulfillment Center Preliminary Hydrology Report, MSA Consulting, August 2023
2. Palm Springs Fulfillment Center Project-Specific Preliminary Water Quality Management Plan, MSA Consulting, January 2023.
3. Water Supply Assessment/Water Supply Verification, Palm Springs Fulfillment Center, MSA Consulting, August 2023.
4. City of Palm Springs General Plan Update
5. Federal Clean Water Act (CWA), Environmental Protection Agency

6. Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM) Panel 06065C0895G, effective August 28, 2008
7. Indio Subbasin Sustainable Groundwater Management Act (SGMA) Plan
8. Water Quality Control Plan for the Colorado River Basin Region (Basin Plan), March 2023
9. Whitewater River Region Water Quality Management Plan for Urban Runoff and the associated Whitewater River Watershed MS4 Permit, effective June 20, 2013
10. 2018 Coachella Valley Integrated Regional Water Management and Stormwater Resources Plan, December 2018

4.10 Noise

4.10.1 Introduction

This section describes the existing acoustic setting at the project site and in the vicinity and evaluates the potential noise exposure that could result from build-out of the project. Information for this section was obtained from the *North Indian Canyon/19th Ave. High-Cube Warehouse Noise Impact Analysis* ("Noise Study"), prepared by Urban Crossroads, Inc., July 2023 (**Appendix K**), Chapter 8, Noise Element of the Palm Springs General Plan, and the City's Municipal Code.

4.10.2 Existing Conditions

Existing Noise Environment

The project encompasses approximately 38 acres, located at the northwest corner of North Indian Canyon and 19th Avenue in the City of Palm Springs. The local area is characterized by developed industrial and commercial structures to the south and east, vacant land to the north, and vacant and wind energy facilities to the west.

To assess the existing noise environment, 24-hour noise level measurements were taken at three locations near the project. The receiver locations correspond to the closest sensitive receptors to the project site, and include residences varying from 2,054 feet to 3,327 feet from the proposed project (indicated in **Exhibit 4.10-1**, ***Noise Measurement Locations***). The distance between the proposed project and these sensitive receptors is shown in **Exhibit 4.10-2**. Noise level measurements were collected by Urban Crossroads, Inc. on Thursday, October 13th, 2022.

The nearest sensitive receptor is at location R3 at approximately 2,054 feet northeast of the project site boundary. Distance is measured in a straight line from the project boundary to each receiver location.

L1/R1: Located approximately 3,327 feet north of the project site, R1 represents existing noise sensitive trailer home residence at 10769 N Canyon Drive. Since there are no private outdoor living areas (backyards) facing the project site, receiver R1 is placed at the building façade. A 24-hour noise measurement was taken near this location, L3, to describe the existing ambient noise environment.

L1/R2: Location R2 represents the existing noise sensitive residence located at 64088 Teagarden Drive, approximately 2,795 feet northeast of the project site. R2 is placed in the private outdoor living areas (backyard) facing the project site. A 24-hour noise measurement was taken near this location, L1, to describe the existing ambient noise environment.

L1/R3: Location R3 represents the existing noise sensitive residence at 17725 Covey Street, approximately 2,054 feet northeast of the project site. R3 is placed in the private outdoor living areas (backyard) facing the project site. A 24-hour noise measurement near this location, L2, is used to describe the existing ambient noise environment.

Other sensitive land uses in the project study area that are located at greater distances than those identified in the Noise Study will experience lower noise levels due to the additional attenuation from distance and the shielding of intervening structures.

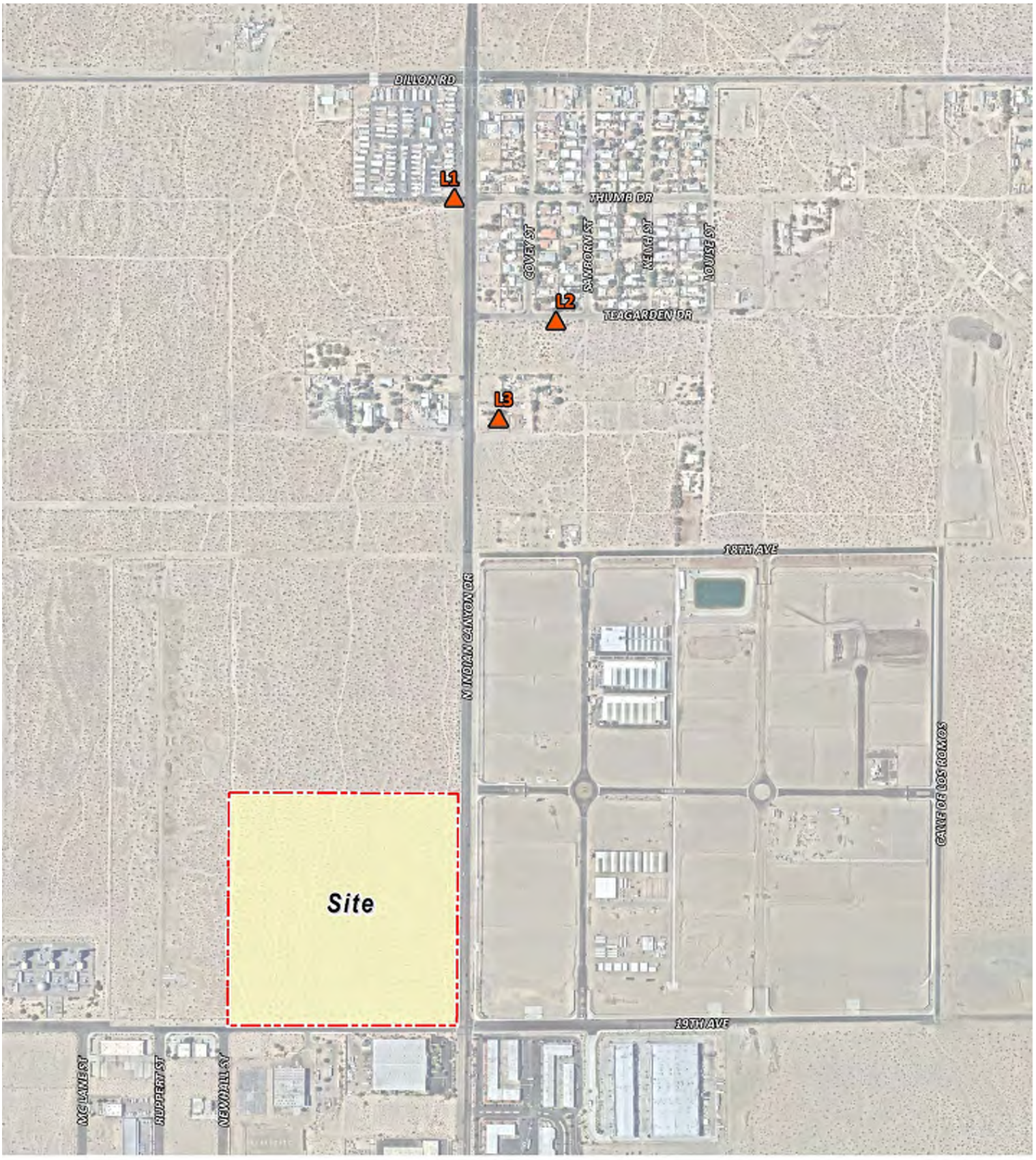
The noise measurements focus on the average, or equivalent sound levels (Leq). The Leq represents the average sound pressure level during a period of time. The time periods include hourly daytime (7:00 a.m. to 6:00 p.m.), evening (6:00 p.m. to 10:00 p.m.), and nighttime (10:00 p.m. to 7:00 a.m.) noise levels at each noise level measurement location. The noise level measurement determined that daytime energy average noise levels (dBA Leq) ranged from 51.9 dBA Leq to 62.6 dBA Leq; evening noise level ranged from 51.9 dBA Leq to 61.5 dBA Leq; and the nighttime noise level ranged from 41.8 dBA Leq to 53.9 dBA Leq. The lowest noise level measurements occurred near Thumb Drive and Indian Canyon Drive (L1 in **Exhibit 4.10-1**); while the highest measurements occurred near the Tripepi Street and Indian Canyon Drive intersection (L3 in **Exhibit 4.10-1**). **Table 4.10-1** provides the noise levels measures for the daytime, evening, and nighttime at all three locations. The background ambient noise levels in the project study area are dominated by the transportation-related noise associated with the arterial roadway network. Methodologies of how existing noise measurements were retrieved are discussed in greater detail in Section 4.10.4, *Methodology*.

Table 4.10-1 24-Hour Ambient Noise Level Measurements

Location[1]	Description	Energy Average Noise Level (dBA L_{eq})[2]			Energy Average Noise Level (dBA L_{50})[2]		
		Daytime	Evening	Nighttime	Daytime	Evening	Nighttime
L1	Located near existing noise sensitive residence at 64088 Teagarden Drive.	55.2	51.9	41.8	46.8	46.5	41.7
L2	Located near existing noise sensitive residence at 17725 Covey Street.	51.9	54.4	51.6	48.8	52.8	50.2
L3	Located near trailer home residence at 10769 N Canyon Drive.	62.6	61.5	53.9	60.4	57.8	51.8

[1] See Exhibit 5-A for the noise level measurement locations in Noise Study.
[2] Energy (logarithmic) average levels. The long-term 24-hour measurement worksheets are included in Appendix 5.2 in Noise Study.
"Daytime" = 7:00 a.m. to 6:00 p.m.; "Evening" = 6:00 p.m. to 10:00 p.m.; "Nighttime" = 10:00 p.m. to 7:00 a.m.

As evidenced by the noise measurements shown in **Table 4.10-1**, the current noise environment of existing sensitive receptors can be characterized as normally acceptable and conditionally acceptable noise levels based on the City of Palm Springs land use compatibility guidelines and noise standards, reflecting an allowable existing ambient noise in these residential areas (i.e., sensitive receivers).



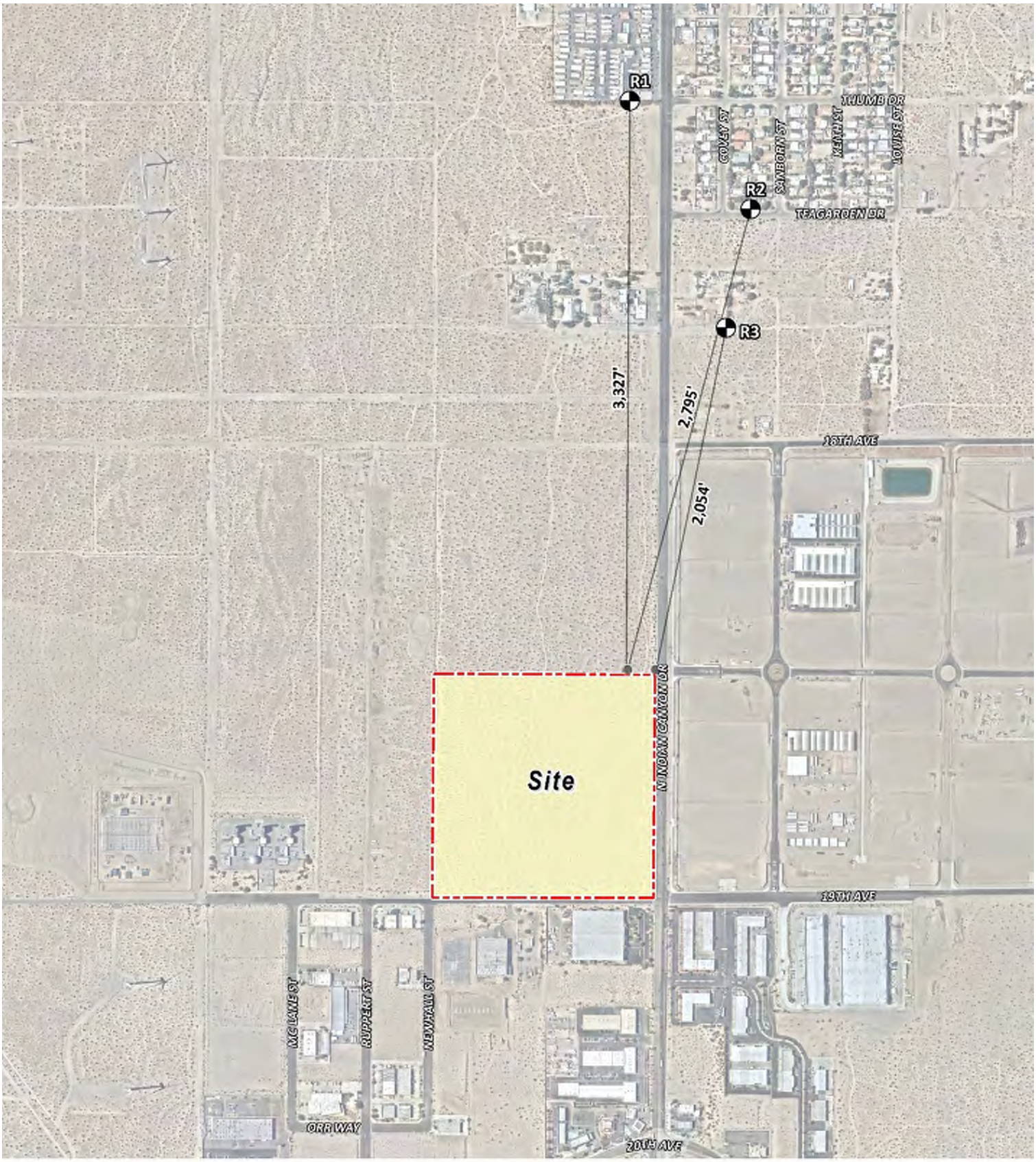
Source: Urban Crossroads, Inc. Noise Study, 2023.

LEGEND:

Site Boundary

MSA CONSULTING, INC.
> PLANNING > CIVIL ENGINEERING > LAND SURVEYING

NOISE MEASUREMENT LOCATIONS
PALM SPRINGS FULFILLMENT CENTER
EXHIBIT 4.10-1



LEGEND:

- Site Boundary
- Receiver Locations
- Distance from receiver to Project site boundary (in feet)

Source: Urban Crossroads, Inc. Noise Study, 2023.

MSA CONSULTING, INC.
> PLANNING > CIVIL ENGINEERING > LAND SURVEYING

NOISE SOURCE AND RECEIVER LOCATIONS

PALM SPRINGS FULFILLMENT CENTER

EXHIBIT 4.10-2

4.10.3 Regulatory Setting

To limit exposure to physically and/or psychologically damaging or intrusive noise levels, federal, State, county, and most California city governments have established standards and ordinances to control noise. Federal and state agencies generally set noise standards for mobile sources such as aircraft and motor vehicles, while regulation of stationary sources is left to local agencies.

Federal

Noise Control Act of 1972

The adverse impact of noise was officially recognized by the federal government in the Noise Control Act of 1972, which serves three purposes:

1. Publicize noise emission standards for interstate commerce;
2. Assist state and local abatement efforts; and
3. Promote noise education and research.

The Federal Office of Noise Abatement and Control (ONAC) originally was tasked with implementing the Noise Control Act. However, it was eventually eliminated, leaving other federal agencies and committees to develop noise policies and programs. Some examples of these agencies are as follows:

- The Department of Transportation (DOT) assumed a significant role in noise control through its various agencies.
- The Federal Aviation Agency (FAA) is responsible for regulating noise from aircraft and airports.
- The Federal Highway Administration (FHWA) is responsible to regulate noise from the interstate highway system.
- The Occupational Safety and Health Administration (OSHA) is responsible for the prohibition of excessive noise exposure to workers.

Occupational Safety and Health Administration

The Occupational Safety and Health Administration (OSHA) requires hearing protection be provided by employers in workplaces where the noise levels may, over long periods of exposure to high noise levels, endanger the hearing of their employees. Standard 29 (Labor) of the Code of Federal Regulations (CFR), Part 1910 prescribes the noise levels under which a hearing conservation program must be provided to workers exposed to high noise levels.

Federal Transit Administration

According to the Federal Transit Administration (FTA), local noise ordinances are typically not very useful in evaluating construction noise. Therefore, the FTA, in their *Transit Noise and Vibration Impact*

Assessment Manual, established a numerical construction threshold for daytime construction impacts. The FTA considers a daytime exterior construction noise level of 80 dBA Leq as a reasonable threshold for noise sensitive residential land use with a nighttime exterior construction noise level of 70 dBA Leq.

State

State of California Noise Requirements

The State of California regulates freeway noise, sets standards for sound transmission, provides occupational noise control criteria, identifies noise standards, and provides guidance for local land use compatibility. State law requires that each county and city adopt a General Plan that includes a Noise Element which must be prepared per guidelines adopted by the Governor's Office of Planning and Research. The purpose of the Noise Element is to limit the exposure of the community to excessive noise levels. In addition, CEQA requires that all known environmental effects of a project be analyzed, including environmental noise impacts.

California Department of Health Services Office of Noise Control

The California Department of Health Services Office of Noise Control (ONC) was established in 1973 to develop regularity tools to control and abate noise for use by local agencies. One significant model is the "Land Use Compatibility for Community Noise Environments Matrix". The matrix allows the local jurisdiction to clearly delineate compatibility of sensitive uses with various incremental levels of noise.

Caltrans

The Caltrans *Transportation and Construction Vibration Guidance Manual* provides vibration damage thresholds to assess potential temporary construction-related impacts at adjacent building locations. The nearest noise sensitive buildings adjacent to the project can be described as "older residential structures" with a maximum acceptable continuous vibration threshold of 0.3 PPV (in/sec). The City of Palm Springs does not identify specific construction vibration level limits; therefore, Caltrans's vibration damage threshold are an appropriate tool to measure vibration levels related to the project.

Regional and Local

City of Palm Springs General Plan

The City of Palm Springs has adopted a Noise Element of the General Plan to control and abate environmental noise, and to protect the citizens of the City from excessive exposure to noise. The Noise Element specifies the maximum exterior and interior noise levels for new developments impacted by transportation noise sources such as arterial roads, freeways, airports and railroads. In

addition, the Noise Element identifies noise policies designed to protect, create, and maintain an environment free from noise that may jeopardize the health or welfare of sensitive receptors, or degrade quality of life. To protect City residents from excessive noise, the Noise Element contains the following two goals applicable to the project:

Goal NS1: Protect residential areas and other sensitive land uses from impacts generated by exposure to excessive noise.

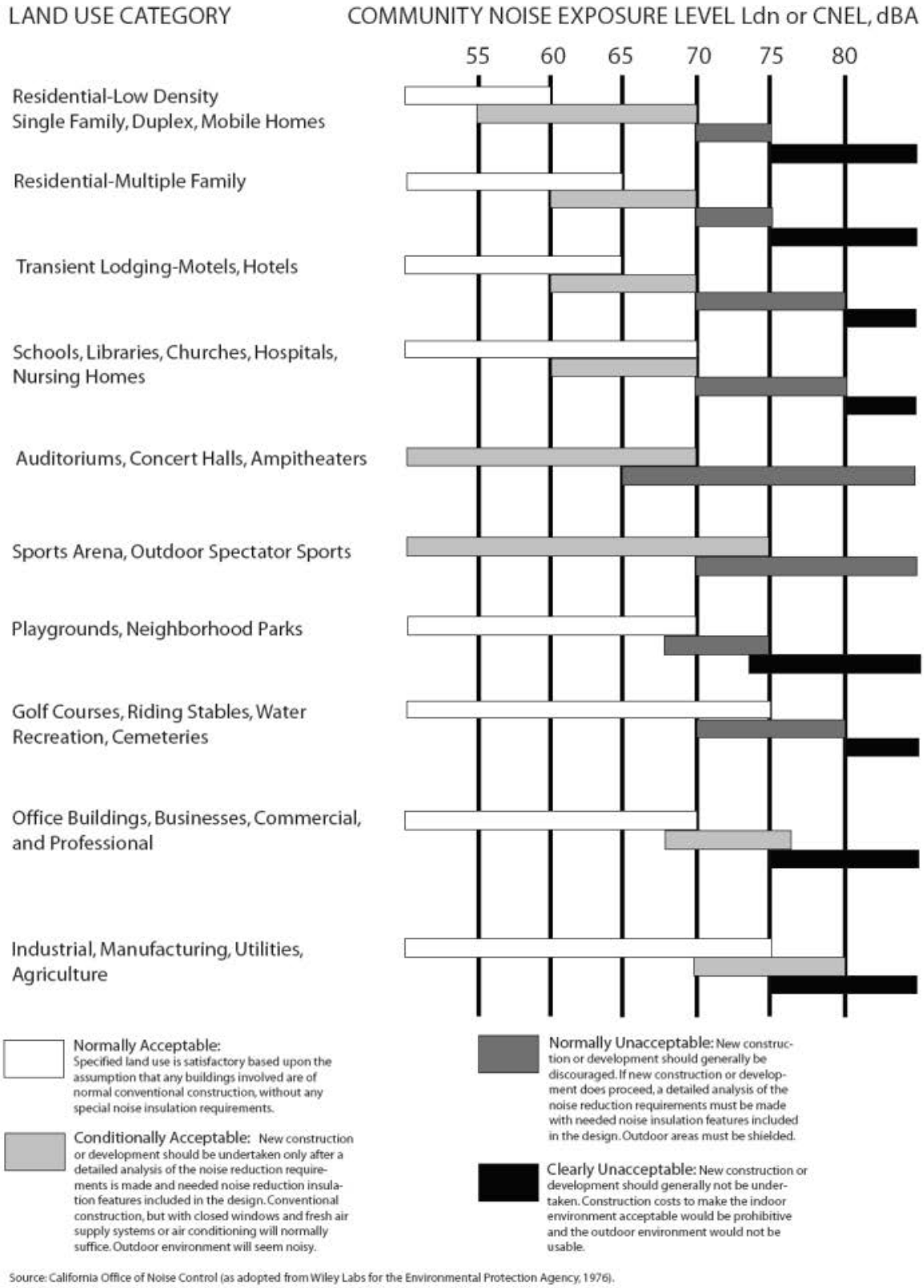
Goal NS2: Minimize, to the greatest extent possible, the impact of transportation related noise on residential areas and other sensitive land uses.

The Land Use Compatibility for Community Noise Exposure matrix in the General Plan provides guidelines to evaluate the acceptability of transportation related noise level impacts. Single-family residential land uses are considered normally acceptable with exterior noise levels below 60 dBA CNEL and conditionally acceptable with noise levels below 70 dBA CNEL.

Table 8-3, *State of California Interior and Exterior Noise Standards*, in the Noise Element, provides specific interior and exterior noise level standards for various land use categories. For noise-sensitive residential uses, the Noise Element requires an exterior noise level not to exceed 65 dBA CNEL. The exterior noise level standards apply to outdoor living areas, such as private yards, and private patios.

The ***Land Use Compatibility for Community Noise Exposure Matrix*** is illustrated as **Table 4.10-2**.

Table 4.10-2 Land Use Compatibility for Community Noise Exposure



Source: California Office of Noise Control (as adopted from Wiley Labs for the Environmental Protection Agency, 1976).

Palm Springs Municipal Code

The City of Palm Springs Municipal Code identifies outdoor residential property noise limits of 50 dBA Leq between the hours of 7:00 a.m. and 6:00 p.m., with noise limits of 45 dBA Leq between the hours of 6:00 p.m. and 10:00 p.m., and noise limits of 40 dBA Leq between the hours of 10:00 p.m. and 7:00 a.m. If the measured ambient noise level exceeds the standards in Section 11.74.031, the ambient noise level becomes the standard.

The Palm Springs Municipal Code established standards to mitigate noise impacts from construction activities. To control noise impacts associated with the construction of the proposed project, the City has established limits to the hours of operation. These are summarized in **Table 4.10-3, *Construction Hours***, below.

Table 4.10-3 Construction Hours

Jurisdiction	Municipal Code Section	Permitted Hours of Construction Activity	Construction Noise Level Standards
Palm Springs	8.04.220	7:00 a.m. to 7:00 p.m. Weekdays 8:00 a.m. to 5:00 p.m. Saturdays No activity Sundays and major holidays	n/a

"n/a" = The City of Palm Springs does not specify specific construction noise level standards.

4.10.4 Project Impact Analysis

Thresholds of Significance

According to the CEQA Guidelines' Appendix G Environmental Checklist, to determine whether noise impacts are significant environmental effects, the following questions are analyzed and evaluated. Would the project:

a. Generate 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. Generate excessive ground-borne vibration or ground-borne noise levels?

Prior to the preparation of the Draft EIR, an NOP was prepared. The Palm Springs Fulfillment Center NOP is included in **Appendix A** of this Draft EIR. Following the screening criterion related to noise in the NOP, the following does not require additional analysis in this Draft EIR.

Threshold c: *For a project located within the vicinity of a private airstrip 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:*

- The closest airport to the project site is the Palm Springs International Airport, located at 3400 East Tahquitz Canyon Way, approximately 4.90 miles southeast of the project property. The project site is located outside of the 70, 65 and 60 CNEL noise contours associated with the airport facility. Furthermore, the Palm Springs Airport Land Use Plan does not identify the project as being located within its planning area. No impacts are expected, and no further discussion of this issue is required.

Issue areas identified as having no impacts are further discussed in **Chapter 6.0, *Effects Found to have No Impact*** of this Draft EIR. Please consult **Chapter 9.0** for a glossary of terms and acronyms used in this Draft EIR.

Methodology

Noise Fundamentals

A detailed description of the fundamentals of noise is provided in **Appendix K**. The following summarizes those details. Noise is simply defined as "unwanted sound". Sound becomes unwanted when it interferes with normal activities, when it causes actual physical harm, or when it has adverse effects on health. Noise is measured on a logarithmic scale of sound pressure level known as a decibel (dB).

A-weighted decibels (dBA) approximate the subjective response of the human ear to broad frequency noise sources and are adjusted to reflect only those frequencies which are audible to the human ear**.** The A-weighted scale is typically used to characterize the noise level generated by various activities and noise sources, as shown in **Table 4.10-4, *Typical Noise Levels***.

Table 4.10-4 Typical Noise Levels

COMMON OUTDOOR ACTIVITIES	COMMON INDOOR ACTIVITIES	A - WEIGHTED SOUND LEVEL dBA	SUBJECTIVE LOUDNESS	EFFECTS OF NOISE
THRESHOLD OF PAIN		140	INTOLERABLE OR DEAFENING	HEARING LOSS
NEAR JET ENGINE		130		
		120		
JET FLY-OVER AT 300m (1000 ft)	ROCK BAND	110		
LOUD AUTO HORN		100	VERY NOISY	
GAS LAWN MOWER AT 1m (3 ft)		90		
DIESEL TRUCK AT 15m (50 ft), at 80 km/hr (50 mph)	FOOD BLENDER AT 1m (3 ft)	80		SPEECH INTERFERENCE
NOISY URBAN AREA, DAYTIME	VACUUM CLEANER AT 3m (10 ft)	70	LOUD	
HEAVY TRAFFIC AT 90m (300 ft)	NORMAL SPEECH AT 1m (3 ft)	60		
QUIET URBAN DAYTIME	LARGE BUSINESS OFFICE	50	MODERATE	SLEEP DISTURBANCE
QUIET URBAN NIGHTTIME	THEATER, LARGE CONFERENCE ROOM (BACKGROUND)	40		
QUIET SUBURBAN NIGHTTIME	LIBRARY	30	FAINT	NO EFFECT
QUIET RURAL NIGHTTIME	BEDROOM AT NIGHT, CONCERT HALL (BACKGROUND)	20		
	BROADCAST/RECORDING STUDIO	10	VERY FAINT	
LOWEST THRESHOLD OF HUMAN HEARING	LOWEST THRESHOLD OF HUMAN HEARING	0		

*Source: Noise Impact Analysis, Exhibit 2-A, Urban Crossroads, July 2023 (**Appendix K**).*

Range of Noise

Each increase of 10 decibels represents a sound energy ten times greater, which is perceived by the human ear as being roughly twice as loud. As shown in **Table 4.10-3** (above), the most common sounds vary between 40 dBA (very quiet) to 100 dBA (very loud) with a normal conversation at three feet being roughly 60 dBA. By comparison, jet engine noises equate to 110 dBA at approximately 100 feet, which can cause serious discomfort. Another important aspect of noise is the duration of the sound and the way it is described and distributed in time.

Noise Descriptors

Environmental noise descriptors are generally based on averages, rather than instantaneous noise levels. The most commonly used figure is the equivalent sound level (Leq).

Noise levels are also perceived differently based on time of day, making averaged noise levels less representative of actual conditions. For example, noise generated during evening hours (7:00 p.m. to 10:00 p.m.) and nighttime (sleeping) hours (10:00 p.m. and 7:00 a.m.) can appear to be louder because the noise environment is quieter at these times. To account for this, the Community Noise Equivalent Level (CNEL), weights noise levels during the evening and nighttime hours, to provide for an average that is more representative of actual conditions.

Sound Propagation

Noise is reduced by distance. Noise from stationary or non-stationary sources is reduced by the outward spreading in a particular pattern (geometric spreading), the absorption into the ground, and effects of the atmosphere such as atmospheric temperature inversion (wind), air temperature, humidity, and turbulence. Shielding from large objects such as trees or other vegetation/barriers and the reflection of noise from a structure or barrier (i.e., wall) are other ways noise is reduced.

Noise Control

Noise can be controlled by limiting the noise source, changing the path that noise travels, or making changes at the receptor location. The most typically used noise barrier is a wall, which when placed close to the noise source can reduce the noise level by 10 to 15 dBA if it is long enough and tall enough to block the noise wave's path.

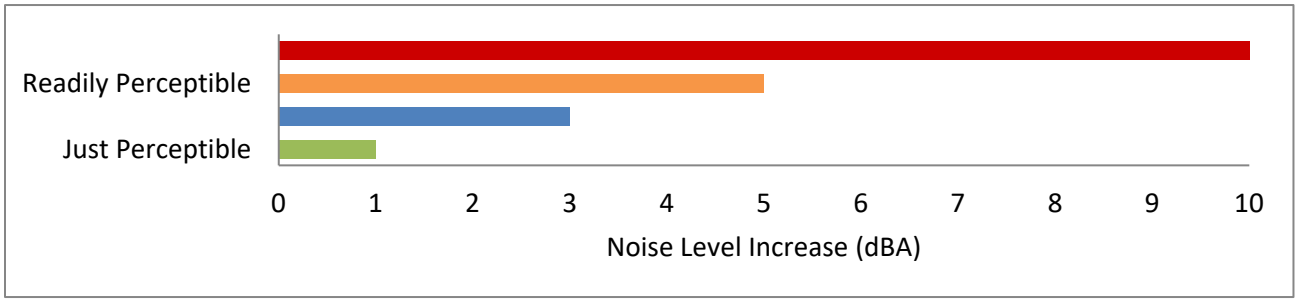
Land Use Compatibility with Noise

Schools, hospitals, churches, and residences are more sensitive to noise intrusion than are commercial or industrial developments and related activities. as a result, the FHWA encourages State and local government agencies to regulate land development in such a way that noise-sensitive land uses are either prohibited from being located adjacent to a highway, or that the developments are planned, designed, and constructed in such a way that noise impacts are minimized. Cities, including Palm Springs, map out land uses based in part on their noise impacts – protecting more noise sensitive such as homes from major roadways, and increasing land use intensity near those major roads, for example.

Community Response to Noise

Generally, people can be expected to exhibit responses to changes in noise levels as shown in **Table 4.10-5, *Noise Level Increase Perception***. An increase or decrease of 1 dBA cannot be perceived; a change of 3 dBA is considered "barely perceptible;" and changes of 5 dBA are considered "readily perceptible."

Table 4.10-5 Noise Level Increase Perception



*Source: Noise Impact Analysis, Exhibit 2-B, Urban Crossroads, July 2023 (**Appendix K**).*

Exposure to High Noise Levels

The OSHA sets legal limits on noise exposure in the workplace. The permissible exposure limit (PEL) for a worker over an eight-hour day is 90 dBA. NIOSH has recommended that all worker exposures to noise should be controlled below a level equivalent to 85 dBA for eight hours to minimize occupational noise induced hearing loss.

Further, periodic exposure to high noise levels in short duration, such as construction, is typically considered an annoyance and not impactful to human health.

Vibration

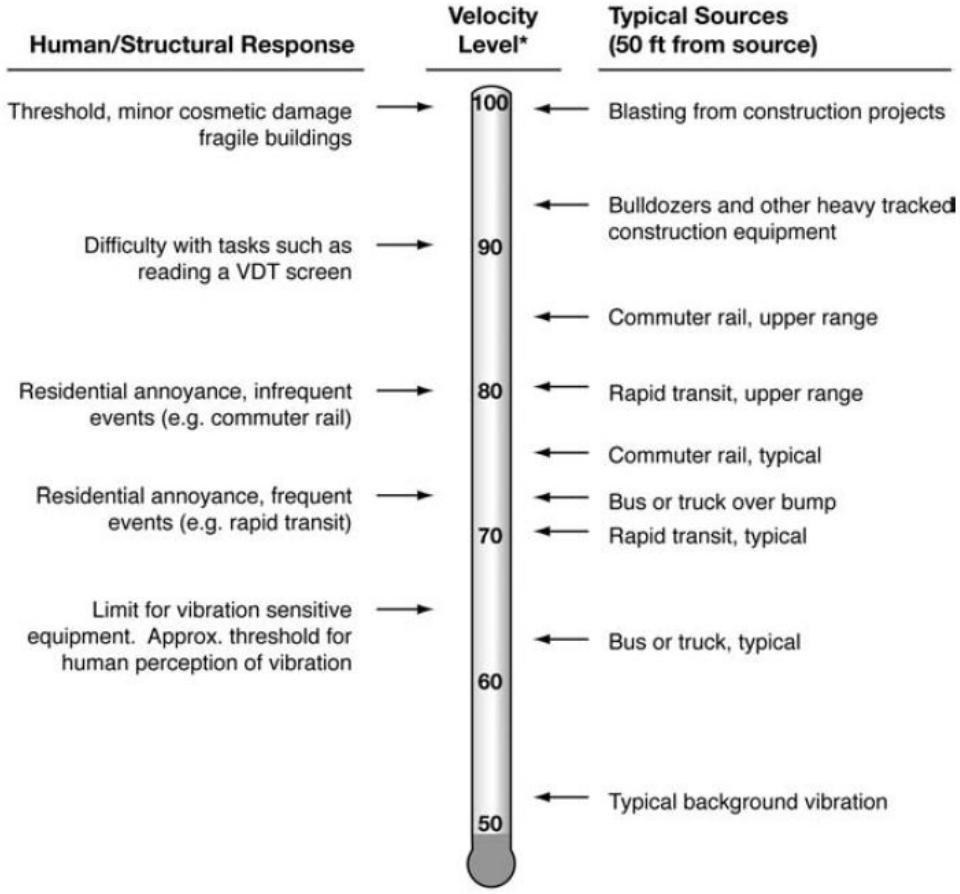
Vibration is the periodic oscillation of a medium or object[1]. Sources of ground-borne vibrations include natural phenomena (e.g., earthquakes, volcanic eruptions, sea waves, landslides) or human-made causes (e.g., explosions, machinery, traffic, trains, construction equipment). Vibration sources may be continuous, such as factory machinery, or transient, such as explosions. As is the case with airborne sound, ground-borne vibrations may be described by amplitude and frequency.

There are several different methods that are used to quantify vibration. The peak particle velocity (PPV) is defined as the maximum instantaneous peak of the vibration signal. The PPV is most frequently used to describe vibration impacts to buildings but is not always suitable for evaluating human response (annoyance) because it takes some time for the human body to respond to vibration signals. Instead, the human body responds to average vibration amplitude often described as the root mean square (RMS). The RMS amplitude is most frequently used to describe the effect of vibration on the human body. Decibel notation (VdB) is commonly used to measure RMS. Typically, ground-borne vibration generated by man-made activities attenuates rapidly with distance from the source of the vibration. Sensitive receivers for vibration include structures (especially older masonry structures), people (especially residents, the elderly, and sick), and vibration-sensitive equipment and/or activities.

The background vibration-velocity level in residential areas is generally 50 VdB. Ground-borne vibration is normally perceptible to humans at approximately 65 VdB. Typical outdoor sources of perceptible ground-borne vibration are construction equipment, steel-wheeled trains, and traffic on rough roads. **Table 4.10-6, *Typical Levels of Ground-Borne Vibration***, shows common vibration sources and the human and structural response to ground-borne vibration.

[1] Federal Transit Administration's (FTA) *Transit Noise Impact and Vibration Assessment*

Table 4.10-6 Typical Levels of Ground-Borne Vibration



** RMS Vibration Velocity Level in VdB relative to 10^{-6} inches/second*

Source: Federal Transit Administration (FTA) Transit Noise Impact and Vibration Assessment.

Significance Thresholds for Noise-Sensitive Receivers

If the ambient noise environment is quiet (<60 dBA) and a project or use greatly increases the noise levels, an impact may occur if the noise criteria may be exceeded. Therefore, FICON identifies a readily perceptible 5 dBA or greater project-related noise level increase as a significant impact when the without project noise levels are below 60 dBA. In areas where the "without project" noise levels range from 60 to 65 dBA, a 3 dBA barely perceptible noise level increase has been recommended by FICON. Finally, when the "without project" noise level increase already exceeds 65 dBA, any increase in community noise of 1.5 dBA or greater is considered a significant impact if the noise criteria for a given land use is exceeded, since it likely contributes to an existing noise exposure exceedance. These FICON standards were used to determine significance of noise increases relating to the proposed project. **Table 4.10-7** provides a summary of the potential noise impact significance criteria, based on guidance from FICON.

Table 4.10-7 Significance of Noise Impacts at Noise-Sensitive Receivers

Without Project Noise Level	Potential Significant Impact
< 60 dBA	5 dBA or more
60 - 65 dBA	3 dBA or more
> 65 dBA	1.5 dBA or more

Source: Federal Interagency Committee on Noise (FICON), 1992.

Significance Thresholds for Non-Noise-Sensitive Receivers

The proposed project is not considered a sensitive receiver. To determine significance at the project site, the acceptable noise levels shown in **Table 4.10-2** were used, which for the warehouse/industrial land use is 75 dBA CNEL.

Construction Noise

Construction Activities

Project construction equipment will include a combination of trucks, power tools, concrete mixers, and portable generators. Noise generated by the construction equipment operating simultaneously can reach high levels when combined. The number and mix of construction equipment are expected to occur in the following stages: Site Preparation; Grading; Building Construction; Paving; and Architectural Coating.

The construction noise analysis was prepared using reference noise level measurements taken by Urban Crossroads to describe the typical construction activity noise levels for each stage of project construction. Noise levels generated by heavy construction equipment can range from approximately 68 dBA to more than 80 dBA when measured at 50 feet. However, these noise levels diminish with distance from the construction site at a rate of 6 dB per doubling of distance. For example, a noise level of 80 dBA measured at 50 feet from the noise source to the receiver would be reduced to 74 dBA at 100 feet from the source to the receiver and would be further reduced to 68 dBA at 200 feet from the source to the receiver.

Construction Noise Level Compliance Threshold

To evaluate whether the project will generate potentially significant temporary construction noise levels at off-site sensitive receiver locations, the construction-related noise level threshold adopted from the FTA *Transit Noise and Vibration Impact Assessment Manual* and described above was used. Based on that criterion, a daytime exterior construction noise level of 80 dBA Leq is a reasonable threshold for noise sensitive residential land uses.

Construction Vibration Standards

The project-specific Noise Study analyzed project generated groundborne vibration and groundborne noise in order to determine whether impacts would be significant. The ground vibration levels associated with various types of construction equipment are summarized in **Table 4.10-8, *Vibration Source Levels for Construction Equipmen*t**.

Table 4.10-8 Vibration Source Levels for Construction Equipment

Equipment	PPV (in/sec) at 25 feet
Small Bulldozer	0.003
Jackhammer	0.035
Loaded Truck	0.076
Large Bulldozer	0.089

Source: Noise Impact Analysis, Table 10-4, Urban Crossroads, July 2023 (Appendix K).

Because the City of Palm Springs does not provide construction vibration level standards, Caltrans's vibration damage threshold was used. To be conservative the project construction vibration impacts are evaluated based on the "older residential structures" maximum acceptable continuous vibration threshold of 0.3 PPV (in/sec).

Significance Criteria Summary

Based on the descriptions above, noise impacts associated with the project will be considered significant if they exceed the standards summarized in **Table 4.10-9, *Significance Criteria Summary***.

Table 4.10-9 Significance Criteria Summary

Analysis	Receiving Land Use	Condition(s)	Significance Criteria		
			Daytime	Evening	Nighttime
Off-Site	Noise-Sensitive	If ambient is < 60 dBA L_{eq}[1]	≥ 5 dBA L_{eq} Project increase		
		If ambient is 60 - 65 dBA L_{eq}[1]	≥ 3 dBA L_{eq} Project increase		
		If ambient is > 65 dBA L_{eq}[1]	≥ 1.5 dBA L_{eq} Project increase		
	Non-Sensitive	If ambient is > 70 dBA CNEL	≥ 3 dBA L_{eq} Project Increase		
Operational	Commercial	Exterior Noise Level Standards[2]	50 dBA L_{eq}	45 dBA L_{eq}	40 dBA L_{eq}
		If ambient is < 60 dBA L_{eq}[1]	≥ 5 dBA L_{eq} Project increase		
		If ambient is 60 - 65 dBA L_{eq}[1]	≥ 3 dBA L_{eq} Project increase		
		If ambient is > 65 dBA L_{eq}[1]	≥ 1.5 dBA L_{eq} Project increase		
Construction	Noise-Sensitive	Noise Level Threshold[3]	85 dBA L_{eq}	n/a	n/a
		Vibration Level Threshold[4]	0.3 PPV (in/sec)	n/a	n/a

[1] FICON, 1992.
[2] City of Palm Springs Municipal Code Section 11.74.031.
[3] Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, 2018.
[4] Caltrans Transportation and Construction Vibration Guidance Manual.
"Daytime" = 7:00 a.m. to 6:00 p.m.; "Evening" = 6:00 p.m. to 10:00 p.m.; "Nighttime" = 10:00 p.m. to 7:00 a.m.; "n/a" = No nighttime construction activity is permitted; "RMS" = root-mean-square

Future Traffic Noise Environment

The Noise Study used the Federal Highway Administration's Traffic Noise Prediction Model

The estimated roadway noise impacts from vehicular traffic were calculated using a computer program that replicates the Federal Highway Administration (FHWA) Traffic Noise Prediction Model-FHWA-RD-77-108. Details of the modeling procedures are provided in **Appendix L.1**.

Consistent with the project-specific Traffic Impact Analysis, the Noise Study provides off-site roadway segment analysis. That analysis included 13 roadway segments (**Table 4.10-10**). The traffic volumes identified for these segments are shown in **Table 4.10-11**, under both existing and project opening year conditions. The analysis also calculated noise levels based on the mix of vehicles (Table 6-4 in **Appendix L.1**) and the types of vehicles and their activity based on time of day (referred to as "vehicle splits"), and provides those calculations in Table 6-3 of **Appendix L.1**

Table 4.10-10 Off-Site Roadway Parameters

ID	Roadway	Segment	Classification[1]	Receiving Land Use[2]	Distance from Centerline to Receiving Land Use (Feet)[3]	Vehicle Speed (mph)
1	Indian Canyon Rd.	n/o Coachillin Way	Major	Non-Sensitive	64'	55
2	Indian Canyon Rd.	n/o 19th Avenue	Major	Non-Sensitive	64'	55
3	Indian Canyon Rd.	n/o 20th Avenue	Major	Non-Sensitive	64'	55
4	Indian Canyon Rd.	n/o Garnet Avenue	Major	Non-Sensitive	64'	55
5	Indian Canyon Rd.	s/o Garnet Avenue	Major	Non-Sensitive	64'	55
6	19th Avenue	w/o Newhall Street	Secondary	Non-Sensitive	64'	35
7	19th Avenue	w/o Indian Canyon Rd.	Secondary	Non-Sensitive	64'	35
8	19th Avenue	e/o 19th Avenue	Secondary	Non-Sensitive	64'	35
9	20th Avenue	w/o Indian Canyon Rd.	Collector	Non-Sensitive	30'	35
10	20th Avenue	w/o Indian Canyon Rd.	Collector	Non-Sensitive	30'	35
11	Garnet Avenue	w/o I-10 EB Ramp	Secondary	Non-Sensitive	64'	45
12	Garnet Avenue	w/o Indian Canyon Rd.	Secondary	Non-Sensitive	64'	45
13	Garnet Avenue	e/o Indian Canyon Rd.	Secondary	Non-Sensitive	64'	45

1 N Indian Canyon/19th Ave High-Cube Warehouse Traffic Analysis, Urban Crossroads, Inc.
2 Based on a review of existing aerial imagery.
3 Distance to receiving land use is based upon the right-of-way distances.

Table 4.10-11 Average Daily Traffic Volumes

ID	Roadway	Segment	Average Daily Traffic[1]			
			Existing		OYC (2024)	
			Without Project	With Project	Without Project	With Project
1	Indian Canyon Rd.	n/o Coachillin Way	17,400	17,900	27,900	28,300
2	Indian Canyon Rd.	n/o 19th Avenue	17,400	18,700	34,700	35,900
3	Indian Canyon Rd.	n/o 20th Avenue	19,800	21,400	37,900	39,500
4	Indian Canyon Rd.	n/o Garnet Avenue	20,200	23,10	37,900	38,200
5	Indian Canyon Rd.	s/o Garnet Avenue	17,500	17,700	21,500	21,700
6	19th Avenue	w/o Newhall Street	300	300	400	400
7	19th Avenue	w/o Indian Canyon Rd.	400	900	600	1,100
8	19th Avenue	e/o 19th Avenue	1,100	1,200	2,900	3,000
9	20th Avenue	w/o Indian Canyon Rd.	2,300	2,300	2,700	2,700
10	20th Avenue	w/o Indian Canyon Rd.	6,300	6,600	16,100	16,400
11	Garnet Avenue	w/o I-10 EB Ramp	1,900	1,900	2,000	2,000
12	Garnet Avenue	w/o Indian Canyon Rd.	5,300	6,000	15,200	15,900
13	Garnet Avenue	e/o Indian Canyon Rd.	2,300	2,300	2,400	2,400

1 N Indian Canyon/19th Ave High-Cube Warehouse Traffic Analysis, Urban Crossroads, Inc.

Operational Noise

The on-site project-related noise sources are expected to include roof-top air conditioning units, loading dock activity, gate opening activity, truck movements, parking lot activity, and trash enclosure activity. To estimate the project operational noise impacts, reference noise level measurements were collected from similar types of activities to represent the noise levels expected with the development of the proposed project, as shown in **Table 4.10-12**. Details of the parameters associated with these measurements are provided in Section 9 of **Appendix L.1**.

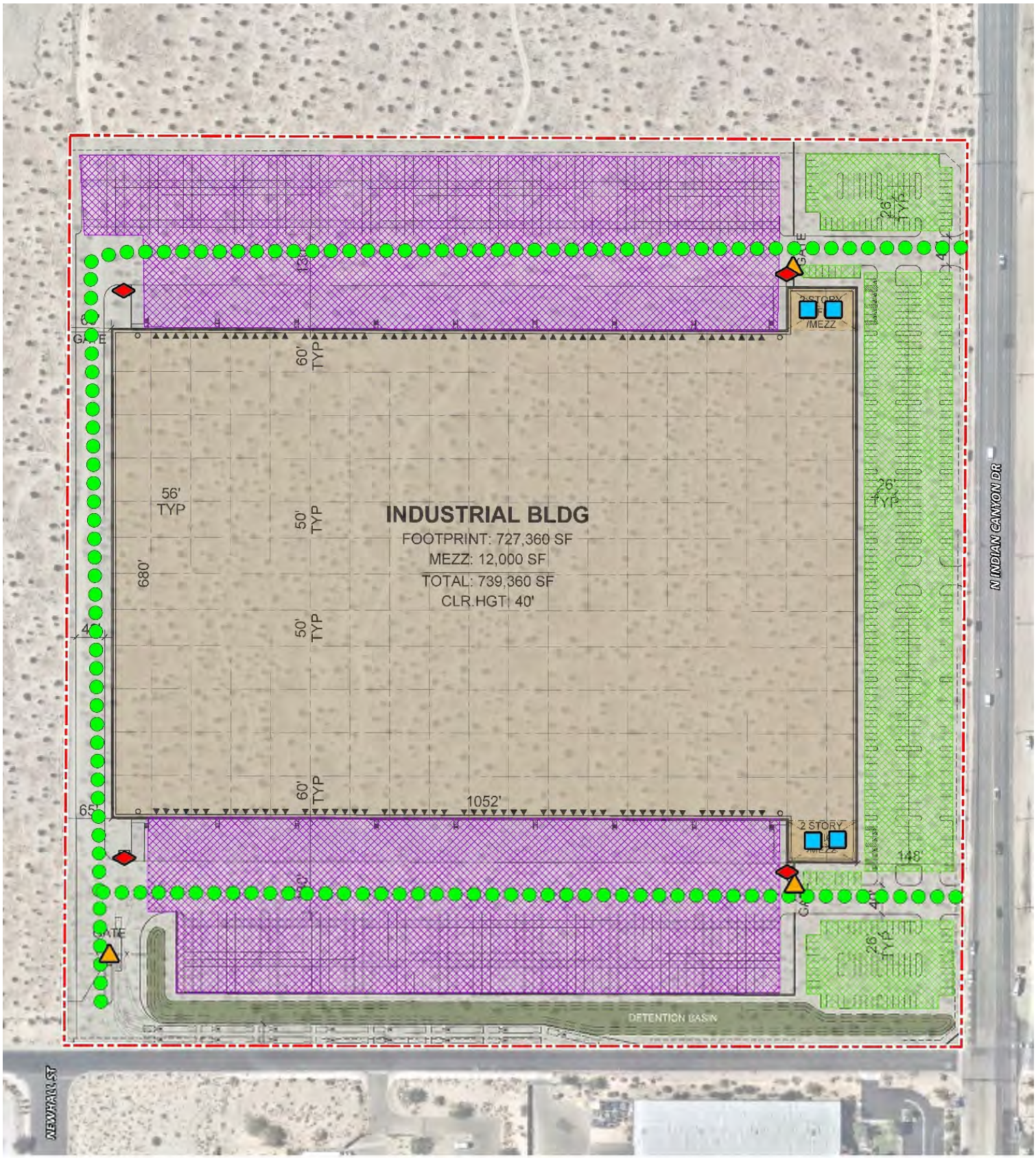
Table 4.10-12 Reference Noise Level Measurements

Noise Source[1]	Noise Source Height (Feet)	Min./Hour[2]			Reference Noise Level (dBA Leq) @ 50 Feet	Sound Power Level (dBA)[3]
		Day	Evening	Night		
Roof-top Air Conditioning Units	3’	45	45	30	57.3	88.9
Loading Dock Activity	8’	60	60	60	79.9	111.5
Gate Opening Activity	8’	60	60	60	61.6	93.2
Truck Movements	8’	60	60	60	61.6	93.2
Parking Lot Activity	5’	60	60	60	49.5	81.1
Trash Enclosure Activity	8’	10	10	10	57.4	89.0

Source: N Indian Canyon/19th Ave High Cube Warehouse Noise Study, Urban Crossroads, Inc.
[1] As measured by Urban Crossroads, Inc.
[2] Anticipated duration (minutes within the hour) of noise activity during typical hourly conditions expected at the Project site. "Daytime" = 7:00 a.m. to 7:00 p.m.; "Evening" = 7:00 p.m. to 10:00 p.m.; "Nighttime" = 10:00 p.m. to 7:00 a.m.
[3] Sound power level represents the total amount of acoustical energy (noise level) produced by a sound source independent of distance or surroundings. Sound power levels calculated using the CadnaA noise model at the reference distance to the noise source.

The Noise Study assumes the project would be operational 24 hours per day, seven days per week and that the on-site noise sources would occur at the same time. However, the sources of noise activity will likely vary throughout the day. **Exhibit 4.10-3** illustrates the proposed project's operational noise source locations.

The CadnaA model was used to calculate the distance from each noise source to the noise receiver locations, using the ground absorption, distance, and barrier/building attenuation inputs to provide a summary of noise level at each receiver and the partial noise level contributions by noise source.



LEGEND:

N

- Roof-Top Air Conditioning Unit
- Trash Enclosure Activity
- Parking Lot Activity
- Gate Activity
- Truck Movements
- Loading Dock Activity

Source: Urban Crossroads, Inc. Noise Study, 2023.

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OPERATIONAL NOISE SOURCES
PALM SPRINGS FULFILLMENT CENTER
EXHIBIT 4.10-3

Project Impacts

Noise Impact Analysis

To assess the off-site transportation CNEL noise level impacts associated with development of the proposed project, noise contours were developed based on the project-specific Traffic Impact Analysis (**Appendix L.1**). Noise contour boundaries represent the equal levels of noise exposure and are measured in CNEL from the center of the roadway. Noise contours were developed for the following traffic scenarios:

- Existing Without/With Project: This scenario refers to the 2022 noise conditions, without the development of the project. The Existing Without Project serves as the baseline for analysis.
- Existing Plus Project (E+P) Conditions: This scenario analyzes the existing roadway system with the addition of project traffic.
- Background Conditions Existing plus Ambient plus Cumulative (EAC) 2024 Without Project: This scenario includes baseline plus anticipated increases in traffic and the addition of known additional projects to determine noise conditions in 2024 without the proposed project.
- Background Plus Project Conditions: Existing plus Ambient plus Project plus Cumulative (EAPC) 2024 With Project: This scenario includes baseline plus anticipated increases in traffic and the addition of known additional projects to determine noise conditions in 2024 with the proposed project.

a. Generation of 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

The project proposes the development of a 736,360-square-foot industrial building west of Indian Canyon Drive and north of 19th Avenue. Project-generated noise during short-term construction activities, and long-term operational activities were evaluated in the project-specific Noise Study (**Appendix K**). The analysis of their findings is discussed below.

Construction

The project-specific Noise Study analyzed the potential impacts resulting from the short-term construction activities associated with the development of the project. Noise generated by the project construction equipment will include a combination of trucks, power tools, concrete mixers, and portable generators that when combined can reach high levels. The number and mix of construction equipment are expected to occur in the following stages: (1) site preparation, (2) grading and horizontal development, (3) building construction, (4) paving, and (5) architectural coating.

As previously discussed in Section 4.10.4, noise levels generated by heavy construction equipment can range from approximately 68 dBA to in excess of 80 dBA when measured at 50 feet. Sensitive receiver locations are indicated in **Exhibit 4.10-2, *Noise Source and Receiver Locations***. The construction noise levels by stage at the nearby noise-sensitive receiver locations are shown in **Table 4.10-13.** Construction impacts are based on the highest noise level calculated at each receiver location. As shown in the table, the construction noise levels are expected to range from 35.7 to 47.1 dBA Leq, and the highest construction levels are expected to range from 43.5 to 47.1 dBA Leq at the nearest noise-sensitive receiver locations. The lower construction noise levels perceived by the nearest noise-sensitive receiver is due to their distance from the project, which is 2,054 feet to 3,327 from the project (to the northeast and north).

Table 4.10-13 Typical Construction Equipment Noise Level Summary

Receiver Location[1]	Construction Noise Levels (dBA L_{eq})					
	Site Preparation	Grading	Building Construction	Paving	Architectural Coating	Highest Levels[2]
R1	46.6	47.1	40.5	41.0	39.3	47.1
R2	44.3	44.8	38.2	38.7	37.0	44.8
R3	43.0	43.5	36.9	37.4	35.7	43.5

[1] Noise receiver locations are shown on Exhibit 10-A in the noise study.
[2] Construction noise level calculations based on distance from the construction activity, which is measured from the project site boundary to the nearest receiver locations. CadnaA construction noise model inputs are included in Appendix K, Noise Study.

The construction noise analysis shows that the nearest receiver locations will experience noise levels well below the 80 dBA Leq significance threshold during project construction activities. Additionally, the City of Palm Springs established construction hours of operation to lessen the impacts of construction noise within Municipal Code Section 8.04.220, as described in **Table 4.10-3, *Construction Hours***. Therefore, noise impacts due to project construction will be less than significant at all sensitive receiver locations.

As shown in **Table 4.10-7**, noise level increases of 5 dBA are readily perceptible, 3 dBA and 1.5 dBA are barely perceptible, depending on the underlying without project noise levels for noise sensitive uses.

As stated in **Table 4.10-1**, ***24-Hour Ambient Noise Level Measurements,*** the existing noise levels range from 51.9 to 62.6 dBA Leq during the daytime hours (i.e., when construction will take place). The highest level of construction noise observed at the sensitive receiver locations will range from 43.5 to 47.1 dBA Leq, as indicated in the table above. Since noise cannot be simply added, the US EPA *Protective Noise Levels* provides assistance in calculating combined noise sources. This calculation is provided in the table below.

Table 4.10-14 Approximate Addition of Sound Levels

Difference Between Two Sound Levels	Add to the Higher of the Two Sound Levels
1 dB or less	3 dB
2 to 3 dB	2 dB
4 to 9 dB	1 dB
10 dB or more	0 dB
Source: US EPA, Protective Noise Levels, 1978	

The table below indicates the difference between the existing ambient noise levels and the construction noise levels when observed from the sensitive receivers. As shown in the table below, the increase in noise would be 0 and 1 dB. Therefore, the increase to the ambient noise level will be less than significant. Additionally, due to the distance of the construction activities from the sensitive receivers, construction would not result in a significant ambient noise increase.

Table 4.10-15 Construction Plus Ambient Noise Levels

Location/ Receiver	Ambient Noise Level (dBA)[1]	Construction Noise Level (dBA)[2]	Difference[3]	Increase[4]
L1/R1	55.2	47.1	8.1	1 dB
L2/R2	51.9	44.8	7.1	1 dB
L3/R3	62.6	43.5	19.1	0 dB

1. Table 4.10-1, 24-Hour Ambient Noise Level Measurements
2. Table 4.10-16, Typical Construction Equipment Noise Level Summary
3. Subtracting the Ambient Noise Level (daytime) with Construction Noise Level
4. Using table 4.10-16, Approximate Addition of Sound Levels

Off Site Improvements

Additional improvements include the project's connection to existing off-site infrastructure to provide electricity, natural gas, water, and sewer services to the project along Indian Canyon and 19th Avenue. Construction of the off-site improvements will comply with City construction hours provided in Municipal Code Section 8.04.220. In addition, construction activities associated with the off-site connections in the right of way will be limited to trenching, the connecting of services, covering, and repaving. These activities are typical of public works in the right of way and will be short term and separated from existing development by distance, walls, and/or fences. The closest noise sensitive structure is 2,054 feet north of the project and proposed off-site improvements. The daytime work limitations and the physical separation between the proposed improvements and existing noise sensitive receivers will reduce potential construction noise to less than significant levels.

Off-Site Traffic Noise

Traffic generated by the operation of the proposed project will increase the traffic noise levels in surrounding off-site areas. To quantify the traffic noise increases on the surrounding off-site areas,

Urban Crossroads calculated the changes in traffic noise levels on 13 roadway segments surrounding the project site based on the change in the average daily traffic (ADT) volumes, as described above.

Noise contours were used to assess the project's incremental 24-hour CNEL traffic-related noise impacts at receiving land uses adjacent to these roadway segments. The noise contours are measured from the center of the roadway for the 70, 65, and 60 dBA CNEL noise levels. The noise contours do not consider the effect of any existing noise barriers or topography that may attenuate ambient noise levels. In addition, because the noise contours reflect modeling of vehicular noise on area roadways, they appropriately do not reflect noise contributions from the surrounding stationary noise sources within the project study area.

Existing Traffic Noise Level

To provide a baseline, the Noise Study calculated the existing noise levels on the 13 roadway segments, as shown in **Table 4.10-16**, below. As shown in this Table, existing noise levels vary from 47.0 dBA to 70.8 dBA. The segment of 19th Avenue, west of Newhall Street, experiences the lowest noise level from traffic, while the segment of Indian Canyon Drive, north of Garnet Avenue, experiences the highest noise level from existing traffic.

Table 4.10-16 Existing Without Project Contours

ID	Road	Segment	Receiving Land Use[1]	CNEL at Receiving Land Use (dBA)[2]	Distance to Contour from Centerline (feet)		
					70 dBA CNEL	65 dBA CNEL	60 dBA CNEL
1	Indian Canyon Rd.	n/o Coachillin Way	Non-Sensitive	70.2	66	142	306
2	Indian Canyon Rd.	n/o 19th Avenue	Non-Sensitive	70.2	66	142	306
3	Indian Canyon Rd.	n/o 20th Avenue	Non-Sensitive	70.8	72	155	334
4	Indian Canyon Rd.	n/o Garnet Avenue	Non-Sensitive	70.8	73	157	338
5	Indian Canyon Rd.	s/o Garnet Avenue	Non-Sensitive	70.2	66	143	307
6	19th Avenue	w/o Newhall Street	Non-Sensitive	47.0	2	4	9
7	19th Avenue	w/o Indian Canyon Rd.	Non-Sensitive	48.3	2	5	11
8	19th Avenue	e/o 19th Avenue	Non-Sensitive	52.7	4	10	21
9	20th Avenue	w/o Indian Canyon Rd.	Non-Sensitive	60.8	7	16	34
10	20th Avenue	w/o Indian Canyon Rd.	Non-Sensitive	65.2	14	31	66
11	Garnet Avenue	w/o I-10 EB Ramp	Non-Sensitive	57.7	10	21	45
12	Garnet Avenue	w/o Indian Canyon Rd.	Non-Sensitive	62.2	19	42	90
13	Garnet Avenue	e/o Indian Canyon Rd.	Non-Sensitive	58.6	11	24	51

[1] Based on a review of existing aerial imagery.

[2] The CNEL is calculated at the boundary of the right-of-way of the receiving adjacent land use.

"RW" = Location of the respective noise contour falls within the right-of-way of the road.

Opening Year Cumulative 2024 Traffic Noise Level Contributions

In order to properly consider the noise impacts of the project, both the anticipated growth in background traffic and the known future projects identified in the Traffic Study (see Cumulative Projects list, Table 4-3 of **Appendix L.1**, Traffic Study) were added to existing noise levels, as well as the traffic generated by the project. The findings of this analysis are shown in **Table 4.10-17**. Without the project, CNEL noise levels are expected to range from 48.3 to 73.6 dBA CNEL, without accounting for any noise attenuation features such as noise barriers or topography. With the project, CNEL noise levels are expected to range from 48.3 to 73.8 dBA CNEL, without accounting for any noise attenuation features such as noise barriers or topography. The noise level increases attributable to the project will range from less than 0.1 to 2.6 dBA CNEL. Based on the significance criteria for off-site traffic noise presented in **Table 4.10-17**, land uses adjacent to the study area roadway segments would experience less than significant noise level impacts associated with traffic generated by project-related traffic noise.

Table 4.10-17 Opening Year Cumulative (2025) Traffic Noise Level Increases

ID	Road	Segment	Receiving Land Use[1]	CNEL at Receiving Land Use (dBA)[2]			Incremental Noise Level Increase Threshold	
				No Project	With Project	Project Addition	Limit	Exceeded?
1	Indian Canyon Rd.	n/o Coachillin Way	Non-Sensitive	72.2	72.3	0.1	3.0	No
2	Indian Canyon Rd.	n/o 19th Avenue	Non-Sensitive	73.2	73.3	0.1	3.0	No
3	Indian Canyon Rd.	n/o 20th Avenue	Non-Sensitive	73.6	73.8	0.2	3.0	No
4	Indian Canyon Rd.	n/o Garnet Avenue	Non-Sensitive	73.5	73.6	0.1	3.0	No
5	Indian Canyon Rd.	s/o Garnet Avenue	Non-Sensitive	71.1	71.2	0.0	3.0	No
6	19th Avenue	w/o Newhall Street	Non-Sensitive	48.3	48.3	0.0	n/a	No
7	19th Avenue	w/o Indian Canyon Rd.	Non-Sensitive	50.1	52.7	2.6	n/a	No
8	19th Avenue	e/o 19th Avenue	Non-Sensitive	56.9	57.0	0.1	n/a	No
9	20th Avenue	w/o Indian Canyon Rd.	Non-Sensitive	61.5	61.5	0.0	n/a	No
10	20th Avenue	w/o Indian Canyon Rd.	Non-Sensitive	69.2	69.3	0.1	n/a	No
11	Garnet Avenue	w/o I-10 EB Ramp	Non-Sensitive	58.0	58.0	0.0	n/a	No
12	Garnet Avenue	w/o Indian Canyon Rd.	Non-Sensitive	66.8	67.0	0.2	n/a	No
13	Garnet Avenue	e/o Indian Canyon Rd.	Non-Sensitive	58.8	58.8	0.0	n/a	No

[1] Based on a review of existing aerial imagery. Noise sensitive uses limited to existing residential land uses.
[2] The CNEL is calculated at the boundary of the right-of-way of each roadway and the property line of the nearest adjacent land use.
[3] Does the project create an incremental noise level increase exceeding the significance criteria (Table 4-1 in noise study).
"n/a" = a barely perceptible 3 dBA or greater noise level increase is considered a significant impact when the ambient non-noise sensitive noise level is greater than the normally acceptable 70 dBA CNEL land use compatibility criteria.

Operational Noise Impacts

Project operational noise will involve roof-top air conditioning units, loading dock activity, gate opening activity, truck movements, parking lot activity, trash enclosure activity. The reference noise levels presented in Section 4.10.4, *Methodology*, were used to calculate the operational source noise

levels that are expected to be generated at the project site and the project-related noise level increases that would be experienced at each of the sensitive receiver locations. The noise levels generated by stationary sources at the project were calculated for daytime, evening and nighttime conditions, since the project could operate 24 hours per day. **Table 4.10-18** shows the project operational noise levels during the daytime hours, which are expected to range from 37.2 to 40.8 dBA Leq. **Table 4.10-19** shows the project operational noise levels during the evening hours, which are expected to range from 40.2 to 43.9 dBA Leq; and **Table 4.10-20** shows the project operational noise levels during the nighttime hours, which are expected to range from 38.0 to 41.6 dBA Leq.

Table 4.10-18 Daytime Project Operational Noise Levels

Noise Source[1]	Operational Noise Levels by Receiver Location (dBA Leq)		
	R1	R2	R3
Roof-Top Air Conditioning Units	18.3	16.1	14.7
Loading Dock Activity	40.8	38.4	37.2
Gate Opening Activity	23.4	20.8	19.3
Truck Movements	14.6	12.2	11.0
Parking Lot Activity	14.3	11.6	9.8
Trash Enclosure Activity	13.3	10.8	9.5
Total (All Noise Sources)	**40.8**	**38.4**	**37.2**

[1]See Exhibit 4.10-3 for noise source locations. CadnaA noise model calculations are included in Appendix K, Noise Study.

Table 4.10-19 Evening Project Operational Noise Levels

Noise Source[1]	Operational Noise Levels by Receiver Location (dBA Leq)		
	R1	R2	R3
Roof-Top Air Conditioning Units	21.3	19.1	17.8
Loading Dock Activity	43.9	41.5	40.2
Gate Opening Activity	26.4	23.8	22.3
Truck Movements	14.6	12.2	11.0
Parking Lot Activity	17.3	14.7	12.8
Trash Enclosure Activity	16.3	13.8	12.5
Total (All Noise Sources)	**43.9**	**41.5**	**40.2**

[1]See Exhibit 4.10-3 for noise source locations. CadnaA noise model calculations are included in Appendix K, Noise Study.

Table 4.10-20 Nighttime Project Operational Noise Levels

Noise Source[1]	Operational Noise Levels by Receiver Location (dBA Leq)		
	R1	R2	R3
Roof-Top Air Conditioning Units	17.3	15.1	13.8
Loading Dock Activity	41.6	39.2	38.0
Gate Opening Activity	24.1	21.6	20.0
Truck Movements	14.6	12.2	11.0
Parking Lot Activity	15.0	12.4	10.6
Trash Enclosure Activity	14.1	11.6	10.3
Total (All Noise Sources)	**41.6**	**39.2**	**38.0**

[1]See Exhibit 4.10-3 for noise source locations. CadnaA noise model calculations are included in Appendix K, Noise Study.

The project-only operational noise levels were evaluated against exterior noise level thresholds based on the City of Palm Springs exterior noise level standards. As shown in **Table 4.10-21**, stationary source noise levels will be lower than the City's maximum allowed noise levels for sensitive receptors at all times of the day. Therefore, operational noise impacts are considered less than significant at the nearby noise-sensitive receiver locations.

Table 4.10-21 Operational Noise Level Compliance

Receiver Location	Project Operational Noise Levels (dBA Leq)[2]			Project Operational Noise Levels (dBA Leq)[3]			Noise Level Standards Exceeded?[4]		
	Daytime	Evening	Nighttime	Daytime	Evening	Nighttime	Daytime	Evening	Nighttime
R1	40.8	43.9	41.6	50.0	46.5	41.7	No	No	No
R2	38.4	41.5	39.2	50.0	52.8	50.2	No	No	No
R3	37.2	40.2	38.0	60.4	57.8	51.8	No	No	No

[1]See Exhibit 4.10-2 for the receiver locations.
[2] Proposed Project operational noise levels as shown on Tables 4.10-18 through 4.10-20.
[3] Exterior noise level standards reflect ambient noise level measurements.
[4] Do the estimated project operational noise source activities exceed the noise level standards?
"Daytime" = 7:00 a.m. to 7:00 p.m.; "Evening" = 7:00 p.m. to 10:00 p.m.; "Nighttime" = 10:00 p.m. to 7:00 a.m.

Project Operational Noise Level Increase

To determine if the project would increase noise levels when combined with existing noise at the sensitive receiver locations, Urban Crossroads, in their Noise Study, logarithmically added the noise (since decibels are logarithmic units) using the following equation:

$$SPL_{Total} = 10\log_{10}[10^{SPL1/10} + 10^{SPL2/10} + \ldots 10^{SPLn/10}]$$

Where "SPL1," "SPL2," etc. are equal to the sound pressure levels being combined, or in this case, the project-operational and existing ambient noise levels. The difference between the combined project and ambient noise levels describes the project noise level increase to the existing ambient noise environment. As indicated in **Table 4.10-22**, the project will generate unmitigated daytime operational noise level increase ranging from 0.0 to 0.1 dBA Leq at nearby off-site receiver locations. **Table 4.10-23** shows that the project will generate an unmitigated evening operational noise level increase ranging from 0.0 to 0.2 dBA Leq at the nearest receiver locations. **Table 4.10-24** shows that the project will generate an unmitigated nighttime operational noise level increase ranging from 0.2 to 1.9 dBA Leq at the nearest receiver locations. As indicated on **Tables 4.10-22** through **4.10-24**, the project-related operational noise level increases will be less than the thresholds shown in **Table 4.10-9**. Therefore, the project operational noise level increases are considered less than significant at all receiver locations.

Table 4.10-22 Daytime Project Operational Noise Level Increases

Receiver Location[1]	Total Project Operational Noise Level[2]	Meas. Location[3]	Reference Ambient Noise Levels[4]	Combined Project and Ambient[5]	Project Increase[6]	Increase Criteria[7]	Increase Criteria Exceeded?
R1	40.8	L3	62.6	62.6	0.0	3	No
R2	38.4	L1	55.2	55.3	0.1	5	No
R3	37.2	L2	51.9	52.0	0.1	5	No

[1] See Exhibit 9-A in the noise study for the off-site sensitive receiver locations.
[2] Total Project operational noise levels as shown on Table 9-2 in the noise study.
[3] Reference noise level measurement locations as shown on Exhibit 5-A in the noise study.
[4] Observed daytime ambient noise levels as shown on Table 5-1 in the noise study.
[5] Represents the combined ambient conditions plus the Project activities.
[6] The noise level increase expected with the addition of the proposed Project activities.
[7] Significance increase criteria as shown on Table 4-1 of the noise study.

Table 4.10-23 Evening Project Operational Noise Level Increases

Receiver Location[1]	Total Project Operational Noise Level[2]	Meas. Location[3]	Reference Ambient Noise Levels[4]	Combined Project and Ambient[5]	Project Increase[6]	Increase Criteria[7]	Increase Criteria Exceeded?[8]
R1	40.8	L3	61.5	61.5	0.0	3	No
R2	38.4	L1	51.9	52.1	0.2	5	No
R3	37.2	L2	54.4	54.5	0.1	5	No

[1] See Exhibit 9-A in the noise study for the off-site sensitive receiver locations.
[2] Total Project operational noise levels as shown on Table 9-3 in the noise study.
[3] Reference noise level measurement locations as shown on Exhibit 5-A in the noise study.
[4] Observed daytime ambient noise levels as shown on Table 5-1 in the noise study.
[5] Represents the combined ambient conditions plus the Project activities.
[6] The noise level increase expected with the addition of the proposed Project activities.
[7] Significance increase criteria as shown on Table 4-1 of the noise study.

Table 4.10-24 Nighttime Project Operational Noise Level Increases

Receiver Location[1]	Total Project Operational Noise Level[2]	Meas. Location[3]	Reference Ambient Noise Levels[4]	Combined Project and Ambient[5]	Project Increase[6]	Increase Criteria[7]	Increase Criteria Exceeded?[8]
R1	41.6	L3	53.9	54.1	0.2	3	No
R2	39.2	L1	41.8	43.7	1.9	5	No
R3	38.0	L2	51.6	51.8	0.2	5	No

[1] See Exhibit 9-A in the noise study for the off-site sensitive receiver locations.
[2] Total Project operational noise levels as shown on Table 9-4 in the noise study.
[3] Reference noise level measurement locations as shown on Exhibit 5-A in the noise study.
[4] Observed daytime ambient noise levels as shown on Table 5-1 in the noise study.
[5] Represents the combined ambient conditions plus the Project activities.
[6] The noise level increase expected with the addition of the proposed Project activities.
[7] Significance increase criteria as shown on Table 4-1 of the noise study.

Conclusion

As described throughout this discussion, construction of the proposed project would not result in significant impacts. Additionally, the City of Palm Springs established construction hours of operation to lessen the impacts of construction noise within Municipal Code Section 8.04.220, as described in

Table 4.10-3, *Construction Hours*. Operational noise impacts include the operation of the roof-top air conditioning units, loading dock activity, gate opening activity, truck movements, parking lot activity, and trash enclosure activity. Impacts of project-related construction and operational noise will be less than significant.

b. Generation of excessive groundborne vibration or groundborne noise levels

The Noise Study analyzed the potential impacts of vibration created by the proposed project. Per the Noise Study, potential ground-borne vibration is associated with vehicular traffic and construction activities.

It is expected that ground-borne vibration from project construction activities would cause only intermittent, localized intrusion. The proposed project's construction activities most likely to cause vibration impacts are:

- Heavy construction equipment: Although all heavy mobile construction equipment has the potential of causing at least some perceptible vibration while operating close to buildings, the vibration is usually short-term and is not of sufficient magnitude to cause building damage.
- Trucks: Trucks hauling building materials to construction sites can be sources of vibration intrusion if the haul routes pass through residential neighborhoods on streets with bumps or potholes. Repairing the bumps and potholes generally eliminates the problem.

Ground vibration levels associated with various types of construction equipment are summarized in **Table 4.10-8.** Construction activities, include grading, would have the potential to generate low levels of ground-borne vibration within the project site. Using the vibration source level of construction equipment provided in **Table 4.10-8,** and the construction vibration assessment methodology published by Caltrans, the Noise Study estimated the project's construction vibration levels, as shown in **Table 4.10-25** at the nearby receiver locations.

Table 4.10-25 Construction Equipment Vibration Levels

Receiver[1]	Distance to Const. Activity (Feet)	Receiver Levels (in/sec) PPV[2]					Threshold PPV (in/sec)[4]	Threshold Exceeded?[5]
		Small Bulldozer	Jack-hammer	Loaded Trucks	Large Bulldozer	Peak Vibration		
R1	3,327'	0.000	0.01	0.000	0.000	0.000	0.30	No
R2	2,794'	0.000	0.01	0.000	0.000	0.000	0.30	No
R3	2,054'	0.000	0.01	0.000	0.000	0.000	0.30	No

[1] Receiver locations are shown on Exhibit 10-A in the Noise Study.
[2] Based on the Vibration Source Levels of Construction Equipment included on Table 10-4 in the Noise Study.
[3] Vibration levels in PPV are converted to RMS velocity using a 0.71 conversion factor identified in the Caltrans Transportation and Construction Vibration Guidance Manual, September 2013.
[4] Caltrans Transportation and Construction Vibration Manual, April 2020.
[5] Does the vibration level exceed the maximum acceptable vibration threshold?

As shown on the table above, at distances ranging from 2,054 to 3,327 feet from primary construction activities, construction vibration velocity levels are estimated to be less than 0.01 PPV (in/sec) and

will not exceed City of Palm Springs vibration threshold of 0.30 PPV (in/sec) at any sensitive receiver location. The construction vibration analysis shows that the unmitigated project-related vibration impacts will be less than significant during the construction activities at the project.

The project proposes the 24-hour operation of the warehouse facility, which involves trucks traveling to and from the project site from the Interstate 10 freeway (south). Ground-borne vibration is normally perceptible to humans at approximately 65 VdB. For most people, a vibration-velocity level of 75 VdB is the approximate dividing line between barely perceptible and distinctly perceptible levels. Typical outdoor sources of perceptible ground-borne vibration are construction equipment, steel-wheeled trains, and traffic on rough roads. If a roadway is smooth, the ground-borne vibration is rarely perceptible. According to **Table 4.10-8**, provided by the FTA, a bus or truck would generate 62 VdB, when observed 50 feet from the source. However, a bus or truck driving over a bump in the road would generate 72 VdB \ 50 feet from the source. These are lower than the 75 VdB distinctly perceptible level, and the vibration decreases the further you are from the source. The trucks are anticipated to travel along Indian Canyon Drive from Interstate 10 to the south. The trucks are not anticipated to travel northbound on Indian Canyon Drive, past the sensitive receivers. As stated above, the sensitive receivers are located at distances ranging from 2,054 to 3,327 feet from the project site. At this distance, the sensitive receivers will not be impacted by the trucks traveling along Indian Canyon Drive. Impacts will be less than significant.

4.10.5 Cumulative Impacts

Buildout of the City of Palm Springs would result in an increase of traffic throughout the City as well as the operation of future projects in areas that were previously vacant and undeveloped. The development of vacant lots and the increase of traffic in Palm Springs would result in increased noise levels throughout the City and along local roadways.

Construction

Buildout of Palm Springs would result in construction-related noise, which would lead to an increase in ambient noise. However, construction activities will not occur on all undeveloped lands at once, but will rather be distributed over years, are short-term and would not continue after construction is complete. Construction-related ground-borne vibration would lead to a small increase in vibrations, however, it would not create vibrations large enough to impact surrounding uses. Future developments (including the proposed project) would be required to comply with Palm Springs Municipal Code Section 8.04.220, which establishes hours of operation for construction activities in order to lessen the impacts of construction noise. Cumulative impacts from construction would be less than significant and would occur only during the permitted hours of construction, and would stop once construction was complete.

Off-Site Transportation Noise

According to Figure 8-3, *Future Roadway Noise Contours*, of the Palm Springs General Plan, the segment of Indian Canyon Drive along the project's eastern frontage is expected to be over 70 CNEL at General Plan build out. According to Figure 8-3, the project, and properties along Indian Canyon Drive will experience noise 60 to over 70 CNEL noise contours from noise generated by vehicle and truck traffic along the right-of-way. This is consistent with the anticipated traffic noise level with the project, which, along Indian Canyon Drive will range from 72.3 to 73.8 CNEL (see **Tabe 4.10-17**).

The project, as stated throughout this EIR, is located within the City's Industrial land use designation. Areas north and east of the project are also designated Industrial, while areas south of the project are designated as Regional Business Center. The areas south of the project, and along Indian Canyon Drive are developed. Undeveloped areas north and west of the project will be located within the City's Industrial land use designation. These uses are required to meet City noise standards as established in the General Plan as is the proposed project. Per Table 8-3, *State of California Interior and Exterior Noise Standards*, establishes interior noise standards of 65 CNEL for manufacturing, warehousing, wholesale, and utilities uses. There are no exterior noise standards for these uses. The proposed project and future projects will be required to mitigate noise levels above the acceptable levels established in the General Plan as they occur. The application of. General Plan noise standards, and the requirement that they mitigate their impacts if they increase noise levels above those standards will assure that cumulative impacts related to noise are less than significant.

4.10.6 Mitigation Measures

Mitigation Measures are not required.

4.10.7 Level of Impact Significance after Mitigation

The project will not have any significant noise impacts.

4.10.8 Resources

1. North Indian Canyon/19th Avenue High-Cube Warehouse Noise Impact Analysis, Urban Crossroads, Inc., July 12, 2023.
2. Transit Noise and Vibration Impact Assessment Manual, Federal Transit Administration, April 2020, available at https://dot.ca.gov/-/media/dot-media/programs/environmental-analysis/documents/env/tcvgm-apr2020-a11y.pdf.
3. Transportation and Construction Vibration Guidance Manual, California Department of Transportation, September 2013, available at

https://www.contracosta.ca.gov/DocumentCenter/View/34120/Caltrans-2013-construction-vibration-PDF?bidId=.

4. Protective Noise Levels, US Environmental Protection Agency, 1978

4.11 Population and Housing

4.11.1 Introduction

This section of the Draft Environmental Impact Report (Draft EIR) describes the existing setting regarding population and housing and the potential effects associated with implementation of the project. The consistency of the project with current growth projections is assessed in order to determine if the project would result in substantial population or housing growth beyond that planned through the City General Plan and regional growth plans. Descriptions and analysis in this section are based on population and housing information provided by the *United States Census Bureau, California State Department of Finance (DOF), Southern California Association of Governments (SCAG), Coachella Valley Economic Partnership, the Riverside County General Plan,* and *the City of Palm Springs General Plan*. Additionally, information from the Mission Springs Water District and Southern California Edison were referenced. Sources used in the preparation are included in **Chapter 8.0, *References***, at the end of this Draft EIR.

4.11.2 Existing Conditions

Riverside County

The County of Riverside has experienced substantial growth in recent decades. In April 2000, Riverside County had a total of 1,545,387 people, which increased approximately 41.7 percent to 2,189,641 people by 2010. By January 2021, the County's population was 2,454,453 people, which is an annual increase of approximately one percent per year. In 2020, the median age of Riverside County was 31.8.

In 2000, Riverside County had a total of 584,674 dwelling units, which increased to 800,707 units by 2010, and 872,930 by 2023 (as depicted in **Table 4.11-1**, below). This is an increase of approximately 288,256 dwelling units in two decades. According to the Department of Finance's 2023 population and housing estimates, of the 872,930 housing units in Riverside County, approximately 784,965 units were occupied, and occupied units contained approximately 3.06 persons per household.

Table 4.11.1 Riverside County Population and Dwelling Units

Year	Population	Dwelling Units
2000	1,545,387	584,674
2010	2,189,641	800,707
2022	2,435,525	863,784
2023	2,439,234	872,930

Sources: California Department of Finance, Population and Housing Estimates for Cities, Counties, and the State 1990-2000 and 2011-2022; Department of Finance City/County Population and Housing Estimates 1/1/2023.

Riverside County accommodated 762,114 jobs in 2017. In 2020, approximately 59.7 percent of the population in Riverside County (approximately 1,454,008 people) were in the labor force, according to the U.S. Census Bureau.

City of Palm Springs

According to the City of Palm Springs 2021-2029 Housing Element, the City had a population of 42,807 people in 2000, which increased by 4 percent, to 44,552 people in 2010. In 2020, the population increased to 47,427. Per the U.S. Census, the City of Palm Springs's population was 44,799 people in 2021.

The City of Palm Springs's population accounts for approximately 1.84 percent of the County's total population. The median age in the City was 50.7 in 2010 (US Census data). The most recent Census data (2021) shows the median age in the City to be 56.6, compared to the median age in Riverside County (31.8) and the Nation median (38.1). Additionally, the number of jobs in 2017 in Palm Springs was 32,647; an approximately 0.78 percent decrease in jobs since 2010 (SCAG Local Profiles Palm Springs). Leisure and education provided the largest job sectors, accounting for 25.5 and 25.0 percent of jobs, respectively.

Table 4.11-2, *Total Households, 2010 to 2018*, shows the increase in the number of households (occupied housing units) between 2010 and 2018, according to the SCAG's Local Profile of Palm Springs. In 2010, Palm Springs had 22,746 households, which increased to 23,390 households by 2018, representing a 2.8 percent increase.

Table 4.11-2 Total Households, 2010 to 2018

Jurisdiction	2010	2018	# Increase	% Increase
City of Palm Springs	22,746	23,390	644	2.8

Source: SCAG Local Profiles Palm Springs, 2019.

In 2010, there were a total of 34,794 dwelling units in the City. By 2020, it is estimated that there were 36,012 dwelling units representing a 3.38 percent increase over ten years.

Table 4.11-3, *Housing Tenure, 2010-2018,* shows the housing by tenure in the City of Palm Springs. In 2018, ownership accounted for about 61 percent of occupied housing in Palm Springs. The renter occupied dwelling units represent 39 percent (9,348 units) in 2018.

Table 4.11-3 Housing Tenure, 2010-2018

	2010		2018	
	Units	**Percentage**	**Units**	**Percentage**
Total Housing Units	37,794	--	37,434	--
Occupied Housing Units	22,746	--	23,719	--
Owner Occupied	13,349	59	14,371	61
Renter Occupied	9,397	41	9,348	39
Vacant Housing Units	12,048	35	13,715	37
+ Seasonal or Recreational Use	8,151	23	10,258	27
Homeowner Vacancy Rate	6.7	--	4.0	--
Rental Vacancy Rate	15.5	--	10.4	--

Source: Table 3-8 Housing Tenure, 2021-2029, Palm Springs General Plan Housing Element.

In 2018 the City of Palm Springs had a total of 37,434 housing units, of which 23,719 housing units, or approximately 63.4 percent of units, were occupied. Conversely, 13,715 units, or 37 percent, were registered as vacant according to the Palm Springs Housing Element. This vacancy rate is due to the seasonal, recreational, or occasional use of many of the homes in the City. In 2018, 4 percent of ownership units and 10 percent of rentals were vacant (Housing Element).

4.11.3 Regulatory Setting

State

California Housing Element Law

California State law requires that local governments revise the housing elements in their general plan periodically. The California legislature adopted the Housing Element Law in 1969 to promote a statewide policy of providing housing opportunities for all Californians.

Before a jurisdiction updates their General Plan Housing Element, the California Department of Housing and Community Development (HCD) determines the overall housing need for each region. In a process called the Regional Housing Need Allocation (RHNA), the council of governments (a planning body representing the cities and counties in a given metropolitan area) must allocate this total number of housing units among the cities and unincorporated county areas in its region. The Housing Element is required to be updated every eight years. The current Housing Element planning period extends to 2029.

Regional and Local

Southern California Association of Governments

The Southern California Association of Governments (SCAG) is an association of local governments and agencies that coordinate to address regional issues. The SCAG region encompasses six counties: Imperial, Los Angeles, Orange, Riverside, San Bernardino and Ventura, and is the largest Metropolitan Planning Organization (MPO) in the nation. It is also made up of 191 cities and covers approximately 38,618 square miles. SCAG's Community, Economic and Human Development Committee (CEHD) has oversight over Growth Visioning and Growth Forecasting processes, as well as the Regional Housing Needs Assessment, the Intergovernmental Review effort and the monitoring and analysis of the regional economy.

2020-2045 Regional Transportation Plan / Sustainable Communities Strategy

The 2020-2045 Regional Transportation Plan / Sustainable Communities Strategy (RTP/SCS) (also known as "Connect SoCal") was published in September 2020 and outlines the long-term vision (20+ years) of how the region will address regional transportation and land use challenges and opportunities. The RTP/SCS was prepared by SCAG to analyze the integration of land use and transportation in the SCAG region to influence sustainable growth. The Plan strives to reach state-mandated reductions in greenhouse gas emissions at the regional level through reduced per-capita vehicles miles traveled (VMT). According to SCAG's growth forecasts, the City of Palm Springs will reach a population of 61,600 people by 2045, which is approximately 1.9 percent of the projected 2045 Riverside County total population. The number of households in the City of Palm Springs is projected to increase approximately 34 percent between 2016 and 2045. **Table 4.11-4** displays the City growth forecast.

Table 4.11-4 SCAG Palm Springs County Growth Forecast

	2016	2045
Population	47,100	61,600
Households	23,100	31,300
Employment	31,900	42,500

Source: SCAG 2020-2045 Growth Forecasts.
Note: All figures are rounded to the nearest 1,000.

Regional Housing Needs Assessment

SCAG is responsible for identifying future housing needs in each of its jurisdiction, including the City of Palm Springs. A local jurisdiction's "fair share" of regional housing need is the number of additional dwelling units that will need to be constructed over a given period to accommodate the forecast growth, to replace expected demolitions and conversion of dwelling units to non-dwelling uses, and to achieve a vacancy rate that allows for healthy functioning of the housing market. The allocation is divided into four income categories: Very Low, Low, Moderate, and Above Moderate.

Coachella Valley Association of Governments

The Coachella Valley Association of Governments (CVAG) is the regional planning agency coordinating government services in the Coachella Valley. CVAG, acting as a subregional organization within SCAG, is made up of ten cities, Riverside County and two Native American tribes. The three departments that make up CVAG include the Administration Department, Energy and Environmental Resources Department, and Transportation Department.

Palm Springs General Plan

The Land Use Element in the City of Palm Springs's General Plan (PSGP) provides guidance for buildout of the City by outlining policies and programs that define and shape high quality residential, commercial, industrial, and institutional development in the City. The Land Use Element is connected to the Circulation, Recreation, Open Space, and Conservation, and Housing Elements of the General Plan.

The Palm Springs 2021-2029 Housing Element is the City's official plan for addressing the housing needs of its residents and workforce. It is the City's framework of goals and policies that guide future decisions and priorities with respect to housing. In compliance with the Housing Element Law and the RHNA, the City of Palm Springs updated their Housing Element for the 2021-2029 planning period. **Table 4.11-5, *Regional Housing Needs Assessment, 2021-2029***, shows the RHNA for the City of Palm Springs. As presented in this table, the City must be able to accommodate 2,557 dwelling units, representing a 7.1 percent increase in the number of existing households in the City.

Table 4.11-5 Regional Housing Needs Assessment, 2022-2029

Household Income Levels	Income as a Percent of County Median	RHNA Allocation	Percent
Extremely Low	--	272	10.5
Very Low	Less than 50%	273	10.5
Low	51%–80%	408	16
Moderate	81%–120%	461	18
Above-Moderate	Over 120%	1,143	45
Total		**2,557**	**100**

Source: Table 3-28, Palm Springs RHNA, 2021-2029, Palm Springs General Plan Housing Element.

4.11.4 Project Impact Analysis

Thresholds of Significance

The following thresholds are derived from Appendix G of the CEQA Guidelines and are used to determine the level of potential effect. The significance determination is based on the recommended criteria set forth in Section 15064 of the CEQA Guidelines. Implementation of the project would have a significant effect on population and housing if it is determined that the project will:

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)?

Prior to the preparation of the Draft EIR, an NOP was prepared. The Palm Springs Fulfillment Center NOP is included in **Appendix A** of this Draft EIR. Following the screening criterion related to population and housing in the NOP, the following does not require additional analysis in this Draft EIR.

Threshold b: *Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?*

- The project property comprises approximately 38 acres of undeveloped land in the City of Palm Springs. The City of Palm Springs has previously approved the development of the site for industrial uses. The proposed project does not include the demolition or conversion of existing residential dwelling units to non-residential uses. The project does not include the displacement of any residents within the project area. There will be no impact to the current population of the area as it is vacant land, and the population will increase based on new development. No impacts are expected, and no further discussion of this issue is required.

Issue areas identified as having no impacts are further discussed in **Chapter 6.0, *Effects Found to have No Impact*** of this Draft EIR. Impacts on population and housing were assessed by reviewing existing and anticipated growth in population, employment and housing provided by the DOF, SCAG, and the City of Palm Springs Housing Element. The proposed project's impacts were evaluated by determining their consistency with these estimates and projections, as well as consistency with the General Plan goals and policies set forth in the Housing Element.

Project Impact

a) Induce the substantial unplanned population growth in an area, either directly or indirectly

Direct population growth occurs from the development of new residential units. Indirect population growth could result from the creation of new jobs or the removal of barriers to growth. The proposed project has the potential to induce indirect population growth by providing approximately 718 new jobs, consistent with the project-specific VMT Evaluation (**Appendix L.2**).

Employment

As discussed above, the proposed project would result in approximately 718 jobs. Per the Coachella Valley Economic Partnership's (CVEP) 2023 Economic Report, unemployment rates in the Coachella Valley in 2022 ranged from approximately 5.5 percent in Palm Springs to approximately 11.5 percent in the city of Coachella. According to 2019 Local Profiles reports by the Southern California Association

of Governments (SCAG), a high percentage of City residents and neighboring cities' residents commute outside of the city they reside in for work. For both Desert Hot Springs and Cathedral City, 89 percent of working residents commute for work. SCAG's 2019 Local Profile reports on each city in the Coachella Valley shows that there is an average of 85 percent of working residents in their cities that commute for work; therefore, it is reasonable to assume that unemployed residents in the Coachella Valley could be sufficient to fill the projected 718 positions for the proposed project.

According to the 2023 Updated Land Use Element, the Land Use Plan for the City of Palm Springs includes enough capacity for employment to increase from approximately 28,000 jobs in 2020 to almost 60,000 jobs over the City's build out. Although the Land Use Plan can accommodate significant growth, SCAG anticipates approximately 41,000 jobs in Palm Springs by 2035 according to the Draft 2024 Regional Transportation Plan/Sustainable Communities Strategy. Additionally, the City anticipates industrial development to create employment for the City and the Coachella Valley. The City's General Plan Land Use Element (p. 2-16) states that new and expanded industrial uses within the City will expand the City's job base and are important to the overall economic vitality and balance of land use. Additionally, Table 2-2, *Nonresidential Land Buildout Estimates*, in the Updated Land Use Element states that the City estimates 11,638,620 square feet of industrial development to occur during the City's build out. Therefore, the project's proposed development of a 739,360 square foot industrial building would not cause an exceedance of the City's or SCAG's employment projections or induce substantial indirect population or housing growth related to project-generated employment opportunities.

Employment growth resulting from project implementation would result in a less than significant impacts because the increase is anticipated in the Updated Land Use Element of the General Plan and SCAG's Draft 2024 Regional Transportation Plan/Sustainable Communities Strategy. Employees from the Coachella Valley would be within commuting distance and would not generate a need for housing. Therefore, there would not be a substantial increase in population and impacts would be less than significant.

Population Growth

As of 2023, the City of Palm Springs has a total population of 44,092 people (Department of Finance). The Palm Springs General Plan anticipates that the City population would increase to 94,950 residents at build out of the City. SCAG forecasts that the City of Palm Springs will have approximately 61,600 people by 2045.

The project proposes the development and operation of a fulfillment center. As stated above, the project could generate approximately 718 jobs, which could lead to growth in the City. As described above, it is likely that residents of other cities in the Coachella Valley will be employed at the project.

It can also be assumed that all 718 employees would be relocating from outside of Palm Springs to the City. If this were to occur, the project's 718 employees would increase the population of the City by approximately 1,270 residents based on the 2023 Department of Finance persons per household for the City.

This is an increase of approximately 2.9 percent to the 2023 population numbers of the City, and still below the projected City's buildout and SCAG's 2045 population forecasts of 94,950 and 61,600 people, respectively[1]. Although buildout and full occupancy of the project could potentially result in a 2.9 percent population increase of the current City population, per SCAG, this increase is consistent with City and regional growth projections. Therefore, the project would not result in a substantial unanticipated population increase in the City. Impacts would be less than significant.

Housing

According to the Revised Draft Housing Element (September 2023), Palm Springs has 36,012 housing units as of 2020. The City has recently approved applications for housing units that total 2,262 single-family and condominium units. Vacancies are a key driver of the rent and sales price of housing. The vacancy rate reflects the balance between the demand for housing and the availability of housing. Typically, a vacancy rate of 5 to 6 percent for rentals and 1.5 to 2 percent for ownership housing is optimal, offering a variety of choice and price competition. In 2018, 4 percent of ownership units and 10 percent of rentals were vacant, according to the California Department of Finance.

The project does not propose the development of residential dwelling units on the property. The operation of the project would result in approximately 718 employees, which could result in the need for housing for employees within the City, for employees relocating to the City. However, as stated above, future employees would likely be existing residents of Palm Springs or other cities within the Coachella Valley. The City of Palm Springs' 10 percent vacancy rate and approved 2,262 dwelling units within the City would contribute to the housing availability in the City for new households created by the project's employees, which would total 1,270 if all employees were new householders in the City. Therefore, the proposed project would not result in a substantial increase in the need for housing units in the City. Additionally, implementation of the project will result in an increase in population and housing that is consistent with the projected growth for the City. Impacts would be less than significant.

[1] Based on the VMT Evaluation provided by Urban Crossroads, Inc. (Appendix L.2), the project would generate 718 jobs at total buildout.

Infrastructure Impacts

No new extensions of roads will be associated with the project. The project will connect to existing water, sewer, and electrical lines. The project's proposed connection to the existing infrastructure will provide the necessary utilities for the proposed project.

The existing roadways, Indian Canyon Drive and 19th Avenue, located east and south of the project (respectively) would provide employee and truck access to the project. The project proposes to connect to existing sewer, water, and electricity infrastructure along existing roadways east and south of the project. The project will connect to existing 12-inch water lines on Indian Canyon Drive. The existing water line in 19th Avenue is 12 inches at the project's southwest corner and increases to 16 inches towards the Indian Canyon and 19th Avenue intersection. The project will connect to this water line with 12-inch lines at the project's southwest and southeast corners.

Existing 12-inch sewer lines are located approximately 650 feet east of the project in 19th Avenue. The project will extend the sewer line to the project site with a proposed 8-inch line. The extension of the sewer line could allow for future development within the surrounding area west and north of the project, which are designated for industrial and commercial uses, per the Palm Springs General Plan and Desert Hot Springs General Plan. MSWD plans for growth in their service area in the *MSWD Wastewater System Comprehensive Master Plan*, which outlines major wastewater collection system infrastructure, sewer lines, lift stations, and treatment plant improvements over a 20-year period. According to the 2020 Coachella Valley Regional Urban Water Management Plan, MSWD's long-term water management planning ensures that adequate water supplies are available to meet existing and future water needs within its service area. MSWD's urban water demand was 8,269 acre-feet (AF) for 2020, and the projected urban water demand by 2025 is 8,996 and by 2045 is 17,494 AFY. Based on the Water Supply Assessment (WSA) for the proposed project, located in **Appendix M**, the project is expected to have a total water demand of approximately 118.37 AFY. Additionally, the MSWD is developing a 1.5-million gallons per day Sequence Batch Reactor (SBR) wastewater treatment plant to open in 2023. The treatment plant will increase the District's total wastewater treatment capacity and alleviate a portion of existing wastewater flows currently going to the Horton Wastewater Treatment Plant.

As discussed above, the project will be required to connect to existing electrical infrastructure located along Indian Canyon Drive and 19th Avenue via an underground system. The closest energy facility to the project site is the Indigo Energy Facility located approximately 700 feet west of the project. The Indigo Energy Facility is a 136-megawatt (MW), natural gas, simple-cycle electric peak generating station. Additional substations in the project area include Garnet substation (0.60 miles south), Hugo Substation (0.65 miles southwest), and Devers Substation (2 miles northwest). SCE operates and maintains these facilities.

Similar to MSWD, SCE plans for growth within their service area by upgrading their electric infrastructure, as well as providing alternative energy sources within its service area. Per SCE's 2023 Circuit Reliability Review for the City of Palm Springs, SCE plans to spend more than five billion dollars each year to strengthen and modernize the electrical grid by updating underground cables, poles, switches, and transformers; connecting renewables, installing new substations, and updating lines; updating the grid for new technology impacts; and supporting energy storage, electric vehicles and renewable energy. See **Section 4.5, *Energy Resources,*** and **4.15, *Utilities and Service Systems,*** for further discussion of wastewater and electricity infrastructure.

The project's connection to the surrounding infrastructure for utilities would meet the project's needs without inducing additional growth in the area. For electrical supply, the project would connect to existing lines located on the southwest corner of Indian Canyon Drive and 19th Avenue, running underground along the established right of way. Both water and sewer connections are available on 19th Avenue and Indian Canyon Drive, with the sewer lines existing approximately 650 feet east of the project. The close proximity of the utilities ensures that the project's infrastructure development would not extend in a manner that could stimulate future growth. Therefore, less than significant impacts are anticipated.

4.11.5 Cumulative Impacts

Buildout of the proposed project would result in potential induced growth within the City and surrounding areas; however levels are anticipated by both the City and SCAG's forecast. The project's growth is accounted for in the Palm Springs General Plan and the SCAG regional plans since the project is located in an area designated for industrial development. The General Plan and SCAG plans account for the undeveloped land use areas within the City, which would result in employment opportunities in the area. As discussed above, Table 2-2, *Nonresidential Land Buildout Estimates*, in the Updated Land Use Element states that the City estimates 11,638,620 square feet of industrial development to occur during the City's planning period. The project's 739,360 square foot industrial development accounts for approximately 6 percent of the predicted growth of industrial land uses in the City.

The City General Plan Housing Element for the 2021 to 2029 planning period proposes sufficient housing to accommodate planned growth within the City, while reducing potential exceedances of City and SCAG growth targets. Additionally, the Coachella Valley's nine cities are required to develop 31,125 housing units by 2029. The housing requirements for the Coachella Valley would ensure that current and future residents will have increased opportunities to live in or move to the Coachella Valley for employment. Therefore, the project and projects in the surrounding area will not result in cumulatively considerable population, housing, and employment impacts.

4.11.6 Mitigation Measures

No mitigation measures are required.

4.11.7 Level of Significance after Mitigation

No significant impacts have been identified and no mitigation measures are necessary.

4.11.8 References

1. American Community Survey (ACS) 2018 ACS 5-Year Estimates Data Profiles, available at https://www.census.gov/programs-surveys/acs

2. California Department of Finance (DOF), E-5 Population and Housing Estimates for Cities, Counties, and the State, 2020-2023 with 2010 Census Benchmark, located at http://dof.ca.gov/Forecasting/Demographics/Estimates/E-5/

3. California Department of Finance (DOF), E-8 Historical Population and Housing Estimates for Cities, Counties, and the State, 1990-2000, August 2007, located at http://www.dof.ca.gov/Forecasting/Demographics/Estimates/E-8/

4. California Legislative Information, Government Code, Title 7 Planning and Land Use, Division 1, Planning and Zoning, January 2018, available at https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=GOV&sectionNum=65580

5. Southern California Association of Governments (SCAG), Riverside County – Local Profiles Report 2019, May 2019, available at https://scag.ca.gov/data-tools-local-profiles

6. SCAG 2020-2045 Regional Transportation Plan/Sustainable Community Strategy, September 2020, available at https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal-plan_0.pdf?1606001176

7. United States Census Bureau, 2014-2018 American Community Survey 5-year Estimates, Employment Status, available at https://www.census.gov/data/developers/data-sets/acs-5year.html

8. US EPA, EnviroAtlas, Employment to Housing Ratio, November 2014, available at https://enviroatlas.epa.gov/enviroatlas/DataFactSheets/pdf/Supplemental/EmploymentHousingRatio.pdf

9. Coachella Valley Economic Partnership, 2023 Greater Palm Springs Economic Report, available at https://cvep.com/wp-content/uploads/2023/11/CVEP_2023-Economic-Report_HR_11-2023.pdf

10. 2020 Coachella Valley Regional Urban Water Management Plan, available at https://www.cvrwmg.org/wp-content/uploads/2021/08/Final-Coachella-Valley-RUWMP.pdf

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4.12 Public Services

4.12.1 Introduction

This section addresses the potential impacts to fire protection, emergency medical services, and police protection that may result from construction or operation of the proposed project ("project"). The following discussion addresses existing police and fire conditions of the project site and surroundings, identifies and analyzes environmental impacts, and recommends measures to reduce or avoid adverse impacts anticipated from project implementation, as applicable. This section is based on the information contained in the *City of Palm Springs Website*, the *Palm Springs General Plan, Department of Finance 2023 Population Estimates,* the Vehicle Miles Traveled (VMT) Evaluation provided by *Urban* Crossroads for the proposed project, and the City of *Palm Springs Comprehensive Fee Schedule Fiscal Year 2022-2023*. References used in the preparation of this section are identified at the end of this section, and in **Chapter 8.0, *References,*** at the end of this Draft EIR.

Prior to the preparation of the Draft EIR, an Initial Study was prepared in advance of the NOP for this Draft EIR, and is included in **Appendix A**. Following the screening criterion related to public services in the NOP, the following threshold topic does not require additional analysis in this Draft EIR.

> *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 other public services:*

- *Schools?*
- *Parks?*
- *Other Public Utilities?*

The analysis determined that the project has no potential to affect schools, or other public because the project consists of the development of an industrial building and would not provide housing that could increase the City's population. Energy use is assessed in **Section 4.5** of this report, and other utilities such as water and sewer services are discussed in **Section 4.15**. Potential effects on fire and police protection services are assessed below.

4.12.2 Existing Conditions

The project site is located on undeveloped land consisting of desert scrub habitat of the valley floor. No habitable structures occur on the site. As a baseline condition, the project site has minimal and negligible impacts on fire or police services.

Fire Protection Services

The project is located within the City of Palm Springs which is served by the Palm Springs Fire Department. The Palm Springs Fire Department, established in 1931, provides fire, paramedic, and emergency services within the City limits and through mutual aid agreements in the City's sphere of influence. The Palm Springs Fire Department protects 96 square miles of the Palm Springs area, constantly monitors fire hazards in the City, and has ongoing programs for investigation and alleviation of hazardous conditions. The Palm Springs Fire Department responded to approximately 12,000 calls for service in 2021.25 Firefighters (16 of which are paramedics), 22 Engineers (18 of which are paramedics), 20 Fire Captains (13 of which are paramedics), 4 Battalion Chiefs (3 of which are paramedics), 2 Deputy Fire Chiefs, 1 Fire Chief, 1 Fire Marshall, 13 Dispatchers, 1 Emergency Operations, 1 Fire Plans Examiner, 3 Fire Prevention Specialist, and 3 Fire Administration.

Palm Springs has five fire stations. Their location and distance from the project site are described in **Table 4.12-1**.

Table 4.12-1 Nearby Fire Station Locations

Fire Station	Location	Driving Distance from Project
Palm Springs Fire Station 3	590 E. Racquet Club, Palm Springs	4.3 miles south
RCFD Station 36	11535 Karen Avenue, Desert Hot Springs	4.5 miles northwest
RCFD Station 37	65958 Pierson Boulevard, Desert Hot Springs	5.6 miles northeast
Palm Springs Fire Station 1	277 North Indian Canyon Drive, Palm Springs	5.8 miles south

If needed, additional fire assistance can be provided by the following agencies and municipalities with whom Palm Springs has mutual- and automatic-aid agreements:

- Riverside County Fire Department (RCFD) – mutual-aid
- United States Forest Service (USFS) – mutual-aid
- California Department of Forestry and Fire Protection (CAL FIRE) – mutual-aid
- Bureau of Land Management – mutual-aid
- Cathedral City – automatic-aid

Mutual-aid agreements obligate fire department resources to respond outside their district upon request for assistance. Automatic-aid agreements obligate the nearest fire company to respond to a fire regardless of the jurisdiction. The USFS, RCFD, CAL FIRE, and Bureau of Land Management generally respond to fire emergencies outside of the City's boundaries but within the City's sphere of influence.

The Palm Springs Fire Department is primarily a structure-oriented protective force – these automatic- and mutual-aid agreements ensure an appropriate response to both urban and wildland fires.

Police Protection

The City of Palm Springs Police Department (PSPD) is located at 200 S. Civic Drive, 8 driving miles southeast of the project site. The PSPD's service area covers all areas in the City limits, or approximately 96 square miles. The desired response times for priority one calls (emergencies), and priority two calls (non-emergencies) are 5 minutes and 30 minutes respectively.

According to the City of Palm Spring's General Plan Safety Element, there are currently 100 sworn police officers, which includes the Chief, 2 Captains, 5 Lieutenants, 16 Sergeants, and 76 officers. The department also has 49 civilian personnel. Operations include patrol, jail, and airport operations. Support services include investigation, records, animal control, and communications. The City of Palm Springs has mutual-aid agreements with other local law enforcement agencies in the event of a major incident that exceeds the department's resources. Additionally, Palm Springs police department can call on surrounding police departments for day-to-day mutual aid. During the course of normal law enforcement, small incidents occur that may require immediate assistance. Officers from nearby jurisdictions (Desert Hot Springs, Cathedral City, and other neighboring cities) may respond to these broadcasts on their own initiative (department policy permitting) without a formal mutual aid request.

Although the Department of Finance (DOF) 2023 Population Estimates state that the City has 44,092 residents, the population increases significantly to over 75,000 when part-time residents and tourists are included in the winter months. In 2021, the department responded to 75,395 calls for service, an increase of approximately 35,000 calls since 2010.

4.12.3 Regulatory Setting

Federal

There are no federal regulations applicable to fire and police services in the City.

State

California Building Code

The California Building Code (CBC) establishes the minimum requirements to safeguard the public health, safety and general welfare through structural strength, means of egress facilities, stability, access for persons with disabilities, sanitation, adequate lighting and ventilation and energy conservation; safety to life and property from fire and other hazards attributed to the built environment; and to provide safety to fire fighters and emergency responders during emergency operations.

California Fire Code

State fire regulations are set forth in Sections 13000 *et seq*. of the California Health and Safety Code, which include regulations concerning building standards (as also set forth in the California Building Code), fire protection and notification systems, fire protection devices and standards and fire suppression training.

Local

Palm Springs General Plan

Adopted in 2007, and updated in September 2022, the City of Palm Springs General Plan Safety Element assesses the physical characteristics of the planning area and the community's overall safety. The Safety Element discusses the various hazards in the City's urban and natural environments and provides special consideration to protect the public's safety. Public safety is reasonably assured in the City by the established policies, codes and implementation of mitigation measures designed to reduce hazards, provide emergency response strategies, and coordinate emergency response agencies. Fire protection/prevention services and law enforcement are considered essential for protecting the public's safety in Palm Springs.

The Safety Element identifies appropriate actions to be taken by the City as well as developments in the City to ensure that an adequate level of emergency preparedness is achieved. The following goals, actions, and policies from the Safety Element are applicable to fire and law enforcement safety and new developments:

Goal SA 5: Palm Springs residents, business owners, and visitors protected from urban fire and wildfire hazards.

Policy SA 5.3: Continue to refine procedures and processes to minimize the risk of fire hazards by requiring new and existing development to:

- Utilize fire-resistant building materials.
- Incorporate fire sprinklers as appropriate.
- Incorporate defensible space requirements.
- Comply with Riverside County Fuel Modification Guidelines.
- Comply with CAL FIRE's Fire Safe Regulations and Fire Hazard Reduction Around Buildings and Structures Regulations.
- Provide Fire Protection Plans.
- Comply with the California Building Code and California Fire Code.
- Allow for adequate access of emergency vehicles.

- Develop fuel modification in naturalized canyons and hills to protect life and property from wildland fires yet leave as much of the surrounding natural vegetation as possible.

Policy SA 5.13: Require all new construction to use noncombustible roofing materials.

Goal SA 7: Provide quality police and fire protection to residents, businesses, and visitors of the City.

Action SA 7.1: Maintain a ratio of at least one sworn police officer per 1,000 residents in the City.

Action SA 7.3: Maintain and update, as necessary, the Community Fire Protection Master Plan. The plan shall include a fire station location plan that provides for a response level of service of five minutes. Require all structures located beyond that response time to build in automatic fire suppression systems.

Goal SA 8: Efficient and effective police and fire protection services to residents, businesses, and visitors of the City.

Policy SA 8.6: Require that all buildings subject to City jurisdiction adhere to fire safety codes.

Policy SA 8.9: Continue to regulate and enforce the installation of fire protection water system standards for all new construction projects built within the City. Standards shall include the installation of fire hydrants providing adequate fire flow, fire sprinkler systems, and wet and dry on-site standpipe systems.

Policy SA 8.10: Ensure adequate firefighting resources are available to meet the demands of new development, including the construction of midrise structures, by ensuring that:

- Fire-flow engine requirements are consistent with Insurance Service Office (ISO) recommendations.
- The height of truck ladders and other equipment are sufficient to protect multiple types of structures.
- Fire stations have adequate capacity and resources to keep pace with growth and are outside of hazard-prone areas.

Palm Springs Municipal Code

Ordinance No. 2078 is an amendment to Chapter 8.04 of the Municipal Code and is based on the 2022 CBC which sets minimum design standards for construction of buildings and structures that must also meet minimum fire requirements including *Section 202,* the Five-Minute Fire Department Response Time. The Five-Minute Fire Department Response Time is defined as the time the fire station or response personnel receive notification of a call or emergency service, allowing one-minute for “firefighter turnout” and four-minutes for travel on paved streets. The Palm Springs Fire Department Five-Minute Response Time Map is identified in Appendix P of the Fire Code of the City of Palm Springs.

4.12.4 Project Impact Analysis

Thresholds of Significance

The thresholds derived from Appendix G of the CEQA Guidelines are used to determine the level of potential effect. The proposed project would have a significant effect on population and housing if it is determined that the project will:

a. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any other public services:

   Fire protection?

   Police protection?

Methodology

This analysis considers whether the project would require the construction of new emergency and service facilities and personnel or alterations to such facilities to maintain acceptable performance standards for public services.

Project Design Features

The project is proposing to develop an industrial building on approximately 38 acres with a proposed building area of 739,360 square feet. Offsite improvements include connection to MSWD sewer line and water line. Domestic water would connect to the existing 12-inch water main on 19th Avenue located within the right of way. Sanitary sewer connections to the site would occur on 19th Avenue from an existing 6-inch sewer line approximately 650 feet east of Indian Canyon and 19th Avenue. The project will be required to adhere to the most recent fire safety codes and City policies and will install fire protection systems including fire hydrants providing adequate fire flow, fire sprinkler systems, and wet and dry on-site standpipe systems as stated in Policy SA 8.9 of the Palm Springs General Plan, listed above. The project will also be required to comply with the most current building and electrical codes in place at the time development occurs.

Project Impacts

a. Impacts on:

Fire Protection

The project site's current state is vacant and undeveloped, and fire services are provided to the surrounding area. The project proposes the installation of four fire hydrants on all corners of the project site. The project would also include a 12-inch fire line around all sides of the building. Additionally, emergency vehicle access to the project site would be provided from local and major roadways east and south of the project, and emergency access to the project would be maintained at all times.

Development of the project may cause an incremental increase in demand for emergency services. To reduce impact, the project would adhere to Policy SA 5.3 of the General Plan, which requires the use of fire-resistant building materials, the incorporation of fire sprinklers, when necessary, compliance with CAL FIRE Fire Safe Regulations and Fire Hazard Reduction Around Buildings and Structures Regulations, the development of a Fire Protection Plan, adherence to the CBC and California Fire Code, and ensuring adequate access for emergency vehicles. Along with implementing the requirements of Policy SA 5.3, the project would also be reviewed by City and Fire Department to ensure that the project plans meet the fire protection requirements.

To comply with General Plan Policy 5.3, CAL FIRE requirements, and CBC requirements, a fire suppression system will be included in the industrial facility. The implementation of a fire suppression system is consistent with the General Plan Action SA 7.3 which requires all structures located beyond the response time of 5 minutes to build a fire suppression system. The project is located beyond the response time of 5 minutes; therefore, to ensure that impacts to fire services are less than significant, the project will adhere to Action SA 7.3 and Policy SA 5.3 described above, as well as Policy SA 5.13 which requires all new construction to use noncombustible roofing materials, Policy SA 8.6 which requires that all buildings subject to City jurisdiction adhere to fire safety codes, and Policy SA 8.9 which requires the installation of fire protection water system standards which include fire hydrants, fire sprinkler systems, and wet and dry on-site standpipe systems. Additionally, the project will adhere to the California Fire Code. The California Fire Code and the policies and action described above are City standards that are required to be implemented. With the implementation of the City's standard requirements, and the Fire Department's review of the project plans to ensure that the project would meet fire protection requirements, the project's impact on fire services would be less than significant.

Off-Site Improvements

Mission Springs Water District (MSWD) would provide domestic water and sewer to the project site. Domestic water would connect to the existing 12-inch water main on 19th Avenue located within the right-of-way. Sanitary sewer connections to the site would occur on 19th Avenue from an existing 6-inch sewer line approximately 650 feet east of Indian Canyon and 19th Avenue.

Construction activities of the off-site improvement may briefly impact emergency response times on 19th Avenue and Indian Canyon Drive. Therefore, construction of the proposed offsite improvements would require the implementation of Construction Traffic Control Plans as required by **Mitigation Measure TRA-2** (see **Section 4.13, *Transportation,*** for further discussion). Traffic Control Plans are required by

the City for all projects encroaching and impacting public roadways. With the implementation of the Construction Traffic Control Plans, construction of the offsite improvements would have less than significant impact on fire protection services and would cease once construction of the offsite improvements are complete.

Police protection

The proposed project would develop an industrial warehouse with the potential of an additional 718 service population, based on the VMT Evaluation provided by Urban Crossroads, Inc. (**Appendix L.2**), which assumes the warehouse will employ 718 employees all of whom would come from outside of the City. The development would occur within an area of existing industrial and commercial uses, which is already served by the Palm Springs Police Department; however, due to the service population estimate, development of the project may cause an incremental increase in demand for police services.

According to the DOF 2023 Population Estimates, there were 44,092 residents living in Palm Springs. In the Palm Springs General Plan Safety Element, it was reported that there are 100 working officers for PSPD, approximately 2.3 officers per 1000 Palm Springs residents. Project build-out could result in an additional 718 service population, which would result in a 2.23 officers per 1,000 persons ratio, still exceeding the City's standard of one officer to every 1,000 persons (General Plan Action SA 7.1). Consistent with the General Plan's Safety Element, the City also evaluates the ability to provide proper police protection for new developments in the City to ensure new development does not result in a reduction of law enforcement below acceptable levels (Policy SA1.12 & Policy SA1.13). The project's adherence to standard requirements will reduce impacts to police services to less than significant levels.

Off-Site Improvements

Construction activities of the off-site water and sewer line improvements may briefly impact response times of police response times on 19th Avenue and Indian Canyon Drive. Therefore, construction of the proposed offsite improvements would require the implementation of Construction Traffic Control Plans, which the City requires of all projects that encroach into the public right-of-way during construction (see **Section 4.13, *Transportation,*** for further discussion). With the implementation of the Construction Traffic Control Plans, construction of the off-site improvements would not significantly impact police protection services and would cease once construction of the offsite improvements is complete.

4.12.5 Cumulative Impacts

A "cumulative impact" refers to two or more individual effects which, when considered together, are considerable or which compound or increase other environmental effects. For the purpose of assessing the project's cumulative impact with respect to public services, the cumulative analysis is based on the buildout of the City under its General Plan.

Fire and Police Protection

Implementation of the project and other related projects in the area would increase the demand for fire and police protection services over time. The proposed project and future projects in the City would be required to implement all applicable fire safety policies and requirements, such as the installation of fire hydrants providing adequate fire flow, fire sprinkler systems, automatic fire suppression systems, wet and dry on-site standpipe systems and developing a fire protection plan. Additionally, the proposed project and future projects would also be subject to review by the fire and police departments to ensure access and other safety measures are implemented at the site. The review of the projects also ensures that new development does not result in significant pressure on police and fire facilities. Therefore, the project's contribution would not be cumulatively considerable.

4.12.6 Mitigation Measures

No significant impacts to public services are identified for the proposed project, and no mitigation measures are required.

4.12.7 Level of Significance after Mitigation

Implementation of existing regulations and standards identified above would ensure that the project's potential impacts associated with public facilities and services related to fire and police emergency and non-emergency services would be less than significant.

4.12.8 References

1. City of Palm Springs Comprehensive Fee Schedule Fiscal Year 2023-2024, May 2023

   https://www.palmspringsca.gov/home/showpublisheddocument/85567/638221815069730000

2. City of Palm Springs / Fire Department Website / Police Department Website: https://www.palmspringsca.gov/government/departments/fire-department,
3. City of Palm Springs / Police Department Website: https://www.palmspringsca.gov/government/departments/police
4. Law Enforcement Mutual Aid Plan, 2019 Edition, California Governor's Office of Emergency Services.
5. City of Palm Springs General Plan Safety Element, https://www.psgeneralplan.com/_files/ugd/89af76_7fde384142cd41a8af4387814eb50e70.pdf
6. Department of Finance E5 Population and Housing Estimates, 2023.

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4.13 Transportation

4.13.1 Introduction

This section describes the existing setting, potential project impacts to the area roadway network, and proposed improvements to intersections and roadways and other mitigation required for the implementation of the Palm Springs Fulfillment Center ("project"). This evaluation is based on the information contained in the *N. Indian Canyon/19th Ave High-Cube Warehouse Traffic Analysis* (TA) Vehicle Miles Traveled and (VMT) Analysis, the *Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity*, as well as the 2007 Palm Springs General Plan Circulation Element. The TA and VMT Analysis are found in **Appendix L.1** and **L.2** of this Draft EIR.

California Environmental Quality Act (CEQA) Guidelines were revised to require Vehicle Miles Traveled (VMT) as a replacement for vehicle delay-based level of service (LOS). This is the most current measure for identifying transportation impacts for land use projects. The City's General Plan, however, includes policies relating LOS to evaluate future road network operations and to identify improvements that will be needed to address project and other development impacts. Therefore, the TA is used to evaluate threshold a., and the VMT analysis to evaluate threshold b., below.

The project TA was prepared in accordance with the City of Palm Springs TIA Guidelines (dated July 2020).

4.13.2 Existing Conditions

Environmental Setting

The proposed Palm Springs Fulfillment Center industrial project site consists of approximately 38 acres generally bounded by Indian Canyon Drive to the east; 19th Avenue to the south; vacant land to the north; and vacant land to the west. Regional access to the site and vicinity is provided by US Interstate 10 and Indian Canyon Drive.

Existing Roadway Facilities

A network of roadway segments and intersections, both existing and planned, will be affected by the proposed project. Each of these roadways and their current and planned improvements are briefly discussed below. Fully improved roadways have been constructed to their General Plan Circulation Element cross-section with paving, curb, gutter and parkway.

Existing Roadway Standards and Conditions

19th Avenue: This east-west roadway is designated as a Secondary Thoroughfare with 4 lanes undivided with an 80 to 88-foot ultimate right of way. It is currently a paved 2 lane roadway with no curb or gutter adjacent to the property.

Indian Canyon Drive: This north-south roadway is designated as a Major Thoroughfare, with a proposed 76 to 100-foot right of way, four travel lanes north of 19th Avenue, and six travel lanes south of 19th Avenue (86-to-110-foot right of way). It is divided by a turning movement median and does not allow parking. This roadway forms the eastern boundary of the project. It is currently fully improved on the east side of the road. It is a paved roadway with two southbound lanes and no curb or gutter on the portion adjacent to the project.

Dillon Road: This east-west roadway is classified as a Major Thoroughfare with 4 lanes undivided and a 76 to 100 -foot ultimate right of way.

20th Avenue: This east-west roadway is classified as a Collector. These roads typically have two travel lanes within a 60 to 66-foot right of way. 20th Avenue is fully paved west of Indian Canyon Drive with sidewalk, curb and gutter extending approximately 600 feet along its north side and curb and gutter extending approximately 400 feet along its south side. 20th Avenue is fully paved east of Indian Canyon drive with curb and gutter and intermittent sidewalk approximately 1200 feet along its north side and curb and gutter extending approximately 600 feet along its south side.

Garnet Avenue: This east-west roadway is classified as a Secondary Thoroughfare with 4 lanes undivided with an 80 to 88-foot ultimate right of way. It currently consists of a variety of conditions but is primarily fully improved between Indian Canyon Drive and the I-10 Freeway on-ramp and off-ramp.

Existing Intersection Level of Service

Existing peak hour traffic operations were evaluated for the study area intersections as shown in **Table 4.13-1**, Intersection Analysis for Existing (2022) Intersection Operations. The existing operations analysis indicates that 10 of the 11 existing study area intersections are currently operating at an acceptable LOS (LOS D or better) during the peak hours. One intersection (Indian Canyon Drive and 19th Avenue) is operating at LOS F during the evening peak hour, which the General Plan classifies as an unacceptable LOS (please see Regulatory Setting, below).

Table 4.13-1 Intersection Analysis for Existing (2022) Intersection Operations

ID	Intersection	Traffic Control[1]	Delay (in seconds)[2]		Level of Service	
			AM	PM	AM	PM
1	Indian Canyon Dr./Dillon Rd.	TS	30.0	27.6	C	C
2	Indian Canyon Dr./19th Ave.	CSS	26.9	65.5	D	**F**
3	Indian Canyon Dr./Commercial Plaza	CSS	13.6	15.7	B	C
4	Indian Canyon Dr./20th Ave.	TS	21.5	24.8	C	C
5	Indian Canyon Dr./1-10 WB On-Ramp	UNC	0	0	A	A
6	Indian Canyon Dr./I-10 EB On-Ramp	UNC	0	0	A	A
7	Indian Canyon Dr./Garnet Ave.	TS	27.4	21.8	C	C
8	I-10 EB Ramps/Garnet Ave.	TS	31.9	29.8	C	C
9	I-10 WB Ramps/20th Ave.	TS	22.9	22.2	C	C
10	Newhall St. – Dwy. 4/19th Ave	CSS	8.6	8.7	A	A
11	Indian Canyon Dr./Coachillin	TS	3.0	6.4	A	A
12	Indian Canyon Dr./Dwy. 1	Future Intersection				
13	Indian Canyon Dr./Dwy. 2	Future Intersection				
14	Indian Canyon Dr./Dwy. 3	Future Intersection				

Source: N. Indian Canyon and 19 Ave. High-Cube Warehouse Traffic Analysis, Table 3-1, Urban Crossroads, March 2023.
Notes:

1. TS = Traffic Signal; CSS = Cross-street Stop; AWS = All-Way Stop; UNC = Uncontrolled
2. Per the Highway Capacity Manual 6th Addition (HCM6) , overall average intersection delay and level of service are shown for intersections with a traffic signal or all way stop control. For intersections with cross street stop control, the delay and level of service for the worst individual movement (or movements sharing a single lane) are shown.

Existing Roadway Volumes Summary

Traffic signal warrants for Existing traffic conditions are based on existing peak hour intersection turning volumes. Traffic Signal Warrants for existing traffic conditions indicate that, based on 2022 peak hour intersection volumes, 1 unsignalized study area intersection, Indian Canyon Drive at 19th Avenue, currently warrants a traffic signal.

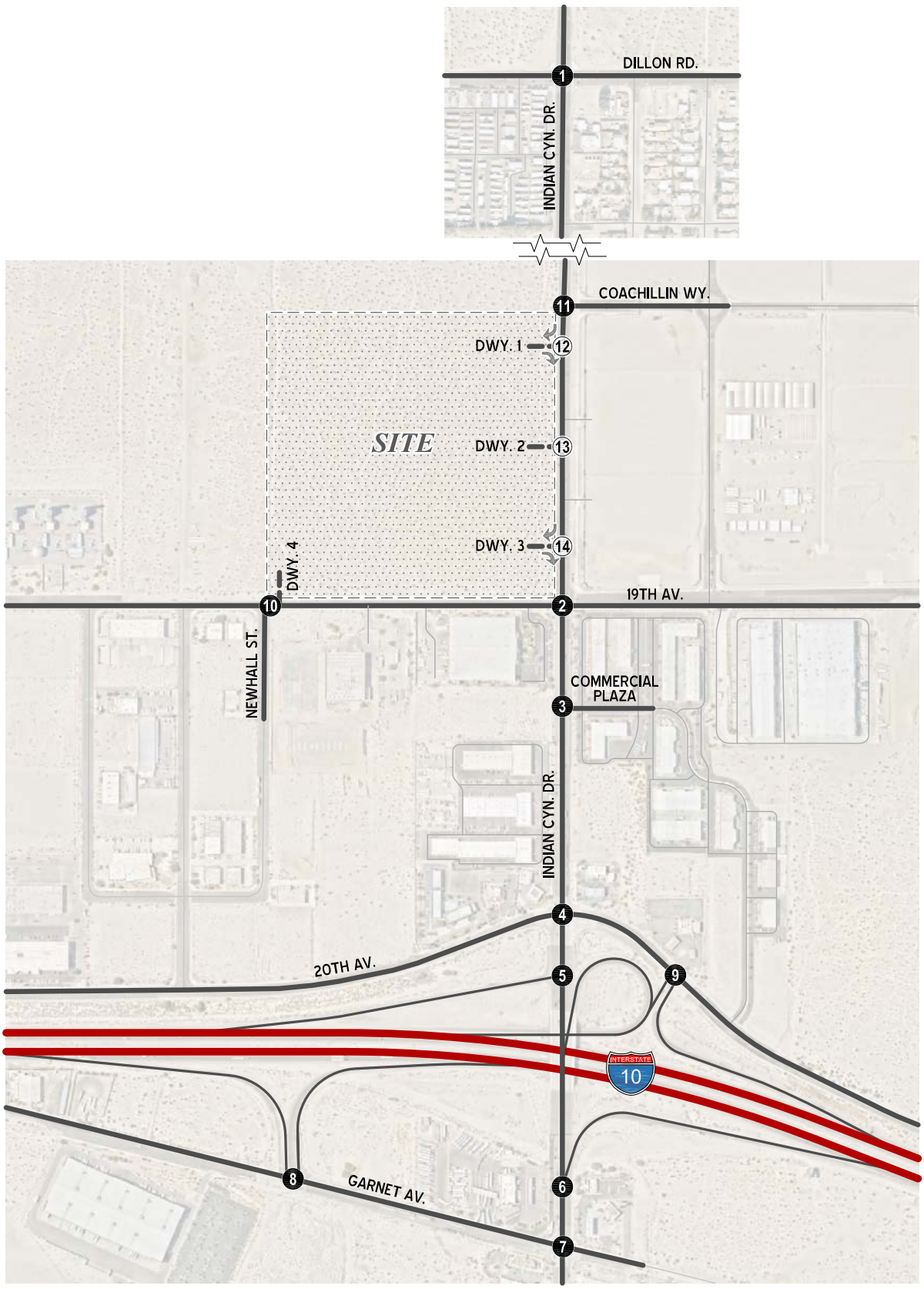
Pedestrian and Alternative Facilities

There is an existing sidewalk on the east side of Indian Canyon Drive that extends south from the northwest corner of the Coachillin Project (across Indian Canyon Drive from the project's northeast corner) to 19th Street. Two small segments (approximately 175 feet each) of sidewalk are located just north of 20th Avenue on the east and west side of Indian Canyon Drive. An existing on-street bike lane is located on the east side of Indian Canyon Drive that extends south from the northwest corner of Coachillin to 20th Avenue.

An existing 430 feet of sidewalk is located on the south side of 19th Avenue extending east from a starting point of approximately 220 feet east of Newhall Street. Planned bicycle and pedestrian facilities within the study area are located along sections of Indian Canyon Drive, 19th Avenue and 20th Avenue.

Transit Service

SunLine Transit Agency provides transit service to the City of Palm Springs, however there are no current bus services within the Project study area. The nearest Sunline transit routes (2 and 5) are located along Palm Drive 3.4 miles driving distance to the east/southeast.



LEGEND:

- 11 = EXISTING ANALYSIS LOCATION
- 3 = FUTURE ANALYSIS LOCATION
- = RIGHT-IN/RIGHT-OUT ONLY
- = FUTURE ROADWAY

N

MSA CONSULTING, INC.
> PLANNING > CIVIL ENGINEERING > LAND SURVEYING

TIA STUDY AREA
PALM SPRINGS FULFILLMENT CENTER
EXHIBIT 4.13-1

4.13.3 Regulatory Setting

Federal Regulations

Federal Highway Administration

The Federal Highway Administration (FHWA) is an agency within the U.S. Department of Transportation (DOT) that supports State and local governments in the design, construction, and maintenance of the Nation's highway system (Federal Aid Highway Program) and various federally and tribal owned lands (Federal Lands Highway Program). Through financial and technical assistance to State and local governments, the Federal Highway Administration is responsible for ensuring that America's roads and highways continue to be among the safest and most technologically sound in the world.

The U.S. DOT released its National Roadway Safety Strategy (NRSS) in January 2022. The NRSS adopts the Safe System approach and outlines key actions to significantly reduce serious injuries and deaths on America's highways, roads, and streets. The FHWA collaborates with other modal agencies and external stakeholders to implement NRSS key actions.

FHWA Strategic Plan (2022-2206) Strategies:

Safe Design: (SDO1) Advance roadway safety through interdisciplinary development and deployment of regulatory and policy tools across FHWA programs and initiatives, such as the Safe System approach. • (SDO2) Conduct and coordinate Federal research to advance safety designs and accelerate use of innovations that mitigate fatality and serious injury crashes for all road users, including those served by Federal Land Management Agencies

Safe System: (SSO1) Facilitate improvements in safety data collection, quality, analysis, integration, and management and expand FHWA's capacity for collecting non-motorized travel risk exposure data. • (SSO2) Provide stewardship and oversight to stakeholders on safety activities and initiatives and on management of discretionary grants.

Safe Public: (SPO1) Encourage stakeholders to develop and implement data-driven, equitable safety management programs. • (SPO2) Expand the use of effective speed management practices in areas where drivers commonly interact with pedestrians and bicycles, including in high-visitation areas on Federal lands, such as National Parks.

Safe Workers: (SWO1) Support worker safety training, provide technical assistance, and work across Federal programs to evaluate and promote strategies to improve safety for workers in transportation occupations such as construction, freight, and traffic incident management.

State Regulations

SB 743

Senate Bill (SB) 743, adopted in 2013 and codified in Public Resources Code Section 21099, amended CEQA to state that automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion shall not be considered a significant environmental impact. SB 743 also directed the California Natural Resources Agency to amend the State CEQA Guidelines to address how the significance of transportation impacts should be determined as part of a CEQA analysis. The legislative intent of SB 743 was to balance the needs of congestion management with statewide goals for infill development, promotion of public health through active transportation, and reduction of greenhouse gas emissions. The State CEQA Guidelines were amended in 2018 to include guidance on determining the significance of transportation impacts. Pursuant to the CEQA Guidelines, the applicable metric for transportation impacts is generally Vehicle Miles Traveled (VMT). The VMT methodology considers the degree to which the project will increase existing vehicle miles traveled in the project study area. The Governor's Office of Planning and Research (OPR) and the California Department of Transportation have also released technical guidance on the implementation of SB 743 and the VMT methodology.

Caltrans

The Caltrans' Guide for the Preparation of Traffic Impact Studies (TIS) (December 2002) states "Caltrans endeavors to maintain a target LOS at the transition between LOS C and LOS D for Basic Freeway Segments, Signalized Intersections and Ramp Terminals. However, Caltrans acknowledges that this may not always be feasible and recommends that the lead agency consult with Caltrans to determine the appropriate target LOS. LOS D was assumed to be the minimum acceptable standard for Caltrans facilities. A project causes a significant impact if it causes the LOS to change from an acceptable LOS (LOS D or better) to a deficient LOS (LOS E or worse) or increases delay/density on a facility operating at an unacceptable level. The TIS should provide the nexus between a project and the traffic impacts to State highway facilities. The TIS should also establish the rough proportionality between mitigation measures (if needed) and traffic impacts. Consultation between the lead agency, Caltrans and those preparing the TIS is recommended to reach consensus on any applicable mitigation measures and who will be responsible. This determines if a project's impacts can be eliminated or reduced to a level of insignificance.

Regional and Local Setting

Regional Transportation Plan and Regional Transportation and Improvement Program

Government Code section 65080 et seq., states that Metropolitan Planning Organizations (MPOs) must prepare and adopt a long-range transportation plan, such as a Regional Transportation Plan (RTP), directed at achieving a coordinated and balanced regional transportation system, including but not limited to mass transportation, highway, railroad, maritime, bicycle, pedestrian, goods movement

and aviation facilities and services. Each transportation planning agency must consider and incorporate, as appropriate, the transportation plans of cities, counties, districts, private organizations and state and federal agencies.

The Southern California Association of Governments (SCAG) is the MPO for the project region.

The SCAG RTP is a multi-modal long-range planning document, developed in coordination with federal, state, and other regional, sub-regional, and local agencies in southern California. The SCAG RTP, prepared every three years, addresses future needs based on a 20-year projection. It includes programs and policies for congestion management, transit, bicycles, pedestrians, roadways, freight, and financing. It is intended to be used as a long-range plan for federally funded transportation projects. Currently, regional projects are programmed in the Riverside County Transportation Improvement Program (RTIP), while locally funded projects (off the State Highway System) are identified in local agency Capital Improvement Plans (CIPs). To comply with Congestion Management Plan (CMP) statutes, regional CIP requirements are identified through the Riverside County Transportation Commission (RCTC) RTIP development process. Projects in the local CIPs may be incorporated into the RTIP for the programming of Flexible Congestion Relief (FCR) and Urban and Commuter Rail funds.

Congestion Management Program

The Congestion Management Program (CMP) is intended to link land use, transportation, and air quality with reasonable growth management methods, strategies and programs that effectively utilize new transportation funds to alleviate traffic congestion and related impacts. The RCTC is the designated Congestion Management Agency (CMA) that prepares the Riverside County Congestion Management Program updates in consultation with local agencies, the County of Riverside, transit agencies and sub-regional agencies like the Coachella Valley Association of Governments (CVAG).

SB 375 requires each Metropolitan Planning Organization agency to adopt a Sustainable Communities Strategy in conjunction with its Regional Transportation Plan. The Sustainable Communities Strategy aligns land use and transportation planning assumptions to ensure attainment of state-mandated regional greenhouse gas emissions targets. The RCTC has designated a system of highways and roadways to include (at a minimum) all State Highway facilities within Riverside County and a system of principal arterials as the Congestion Management System (CMS). All State Highways within Riverside County have been designated as part of the CMP System of Highways and Roadways. The following facilities are designated as part of the Riverside CMP System of Highways and Roadways in the Coachella Valley:

- I-10 (San Bernardino County line to State line)
- SR 111 (I-10 to Imperial County line)
- Ramon Road (I-10 to SR 111)

- Monterey Avenue (I-10 to SR 111)

The Riverside County Long Range Transportation Study indicates that most local agencies in Riverside County and Caltrans have adopted peak hour Level of Service (LOS) standards of "C" or "D" to maintain a desired LOS for the local circulation system. To address CMP requirements RCTC approved a minimum traffic LOS standard of "E".

Coachella Valley Regional Arterial Program

The CVAG administers the Coachella Valley Regional Arterial Program, which allocates Measure A and Transportation Uniform Mitigation Fee (TUMF) funds for necessary improvements to the regional transportation system.

The TUMF program was developed to generate additional funds to fund improvements to the regional arterial roadway system. The TUMF is a development impact assessment that provides funding for transportation improvements required to support new development based on the number of vehicle trips new development will generate. Approximately 55 percent of the funding provided by CVAG consists of TUMF funds with the remainder consisting of Measure A funds. CVAG prepares the Transportation Project Priority Study (TPPS) every 5 five years to determine funding availability for improvements to regional arterials by prioritizing the eligible study segments based on an assessment of the need for improvement.

The mitigation fees collected through the TUMF program are utilized to complete transportation system capital improvements necessary to meet the increased travel demand and to sustain current traffic levels of service. The fee calculations are based on the proportional allocation of the costs of proposed transportation improvements, which are based on the cumulative transportation system impacts of different types of new development. Fees are directly related to the forecast rate of growth and trip generation characteristics of different categories of new development.

Measure A, approved by Riverside County voters in 1988, approved a half-cent increase in sales tax over a 20-year period to be used for transportation purposes. In November 2002, Riverside County voters approved a 30-year extension of Measure "A" (2009–2039). Measure A funds generate a portion of the cost of transportation system improvements projected to be needed over the next 25 years.

To conform to CVAG policies, all CVAG member agencies, including the City of Palm Springs, are required to construct adopted standard road improvements for missing regional road segments located adjacent to land development projects.

City of Palm Springs

City of Palm Springs General Plan Circulation Element

The City has adopted LOS D as the minimum acceptable standard for intersection analysis. A traffic concern occurs if the addition of project-generated trips causes an intersection to change from an acceptable LOS to a deficient LOS, or if project traffic increases the delay at any intersection already operating at an unacceptable LOS. The City has also adopted a maximum volume to capacity ratio of 0.90 as the minimum acceptable standard during peak operating periods for roadway segment analysis. The volume to capacity ratio refers to a comparison of the amount of travel a roadway is designed to handle compared to the actual (or projected) volume of travel on that roadway. The calculation divides volume by capacity.

The purpose of *Goal CR1* of the Palm Springs Circulation Element is to "*Establish and maintain an efficient, interconnected circulation system that accommodates vehicular travel, walking, bicycling, public transit and other forms of transportation*" with the following applicable policies:

Policy CR1.1 Develop a system of roadways that provides travel choices and reduces traffic congestion.

Policy CR1.3 Continue coordination/cooperation with adjacent jurisdictions regarding future roadway sections, standards, and improvements.

Policy CR1.9 Maintain a truck route system that serves business districts, industrial areas, and the Airport.

Policy CR1.10 Continue to implement the City's Transportation Demand Management ordinance and update as necessary.

Policy CR1.11 Encourage large employers (employers with 100 or more persons) to adopt incentive programs that include ridesharing, fleet vehicles and vanpools, preferential parking for rideshares, subsidized shuttle bus services, telecommuting, alternative work hour programs, bicycle racks, lockers and shower rooms, and information on transit services to reduce overall traffic volumes in the City.

Policy CR1.13 Require the owner or applicant of new development projects to fund the cost to mitigate traffic impacts generated by the new development project to LOS D or better.

Policy CR1.14 Pursue an aggressive regional posture advocating new and improved transportation solutions, including continued participation in the Transportation Uniform Mitigation Fee.

Policy CR1.16 Require developers, prior to approval of development plans, to provide increased right-of-way through land dedications to accommodate additional demand for dual left-turn and exclusive right-turn lanes, interchange improvements, bus stops and lanes, bicycle facilities or other improvements required to maintain a minimum

operating LOS D at critical intersections identified in the General Plan Appendix C and Table 4-3.

Policy CR1.1 Require Street dedications from new development projects that are consistent with the right-of-way width identified by the General Plan, including additional right-of-way identified for those development projects located adjacent to a critical intersection, as identified in Figure 4-1.

Policy CR1.4 Encourage developers to provide facilities such as passenger loading areas and reserved parking for carpools and vanpools, and bicycle parking facilities for employees and customers.

Policy CR1.5 Require Traffic Impact Analysis for new development projects to identify specific mitigation to traffic impacts generated by the new development. Traffic Impact Analyses shall be submitted in a format acceptable to the City Engineer and be subject to his/her review and approval.

The City of Palm Springs uses the following bikeway classifications:

Class I (Bike Path or Trail). Off-street bikeways that provide a completely separate right-of-way for the exclusive use of bicycles and pedestrians with crossflow by motorists minimized. The bike path area is physically separated from auto traffic or entirely outside the road right-of-way, and measures a minimum of 8 feet in width for two-way bicycling. Pedestrian paths are characterized by sidewalks or similar rights-of-way shared by cyclists and pedestrians that measure 12 feet wide, of which 8 feet will be designated for pedestrians and 4 feet will be designated for cyclists.

Class II (Bike Lane). Unprotected bikeways defined by a stripe on the roadway. A minimum 4-foot-wide lane within the roadway designated for one-way bicycle traffic.

Class III (Bike Route). Unprotected on-street bikeways sharing the roadway with vehicular traffic. Typically characterized as any type of bikeway, including streets signed as bikeways, that offers no other specific lane or other accommodation for bicycles.

Palm Springs Capital Improvement Program

The City's 5-year CIP identifies costs of needed capital improvements and coordinates financing and timing that maximizes benefit to the public. The purpose of the CIP is to provide the City with a long-range program for major municipal capital construction projects based on the systematic development of select projects and accompanying financial plan. The CIP includes roadway improvements and traffic signal installation and upgrades, as well as other City projects.

Area Roadway System

Roads within the Study Area are a combination of Freeway (Interstate 10,) six lane divided Major Thoroughfares, (Indian Canyon Drive south of 19th Avenue), four lane divided Major Thoroughfares,

(Indian Canyon north of 19th Avenue) and four lane undivided Secondary Thoroughfare, (19th Avenue), and local roadways. Local and Collector streets that feed into the larger roadways were not included in the Study Area analysis as the traffic they generate is already factored into traffic on the larger Thoroughfares and Secondary Roadways.

4.13.4 Project Impact Analysis

Proposed Project

The proposed project consists of an approximately 739,360 square feet Fulfillment Center located on the northwest corner of Indian Canyon Drive and 19th Avenue in the City of Palm Springs. The facility includes passenger vehicle access on both Indian Canyon Drive and 19th Avenue, with truck traffic/access limited to 19th Avenue. There are two right-in/right-out access driveways and one full access driveway along Indian Canyon Drive. A full access driveway is proposed on 19th Avenue. The project is anticipated to be developed by 2024. See **Exhibit 4.13-1, *TA Study Area***.

Thresholds of Significance

The following thresholds are derived from Appendix G of the CEQA Guidelines and are used to determine the level of potential effect. The significance determination is based on the recommended criteria set forth in Section 15064 of the CEQA Guidelines. Implementation of the project would have a significant effect on Transportation if it is determined that the project will:

a. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?
b. Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?
c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?
d. Result in inadequate emergency access?

Methodology

Palm Springs's Transportation Impact Analysis (TA) Guidelines

The City of Palm Springs TA Guidelines were adopted in July 2020. This Policy aligns the City's transportation analysis with California Senate Bill 743 (SB 743) and the City's goals as set forth in the City of Palm Springs's General Plan. This policy establishes the thresholds for transportation impacts under CEQA by introducing Vehicle Miles Traveled (VMT.) As required by SB 743, VMT replaces the former metric used to analyze traffic impacts for CEQA purposes.

<u>VMT</u>

The City Guidelines identify the Riverside County Model (RIVCOM) as the appropriate tool for conducting VMT analysis for land use projects in the City.

The project specific VMT Analysis was prepared based on the adopted City Guidelines. As outlined in the Guidelines, an Industrial project such as the proposed project, must be analyzed by applying the following significance thresholds:

- For Industrial Uses, a project's baseline and cumulative VMT per Service Population (SP) that exceeds the City's adopted impact threshold for VMT per SP (City General Plan buildout VMT per SP is 34.52) is considered to have a significant impact.
- A project's potential effect on Citywide VMT in that the proposed project increases the Citywide VMT per SP for Baseline and Cumulative conditions is considered to have a significant impact.

Level of Service

The City General Plan Circulation Element establishes LOS D as the minimum acceptable standard during peak operating periods for roadway segments and intersections. If a project causes the LOS to change from an acceptable LOS (LOS D or better) to a deficient LOS (LOS E or worse) or increases delay/density on a facility operating at an unacceptable level, it is considered a concern because it is inconsistent with the City's General Plan.

Signal Warrants

A signal warrant defines the minimum condition under which the installation of a traffic signal might be warranted. Meeting this threshold condition requires analysis of several traffic factors and conditions to determine whether the signal is justified. It should also be noted that signal warrants do not necessarily correlate with level of service. An intersection may satisfy a signal warrant condition and operate at or above LOS "D" or operate below LOS "D" and not meet a signal warrant.

Traffic Impact Analysis

The *N Indian Canyon/19th Ave High-Cube Warehouse Traffic Analysis* (TA) is based upon an analysis of existing roadway and intersection conditions in the project vicinity and current traffic volumes, General Plan roadway classifications, and other data and information. The TA provides documentation and analysis of existing traffic conditions, trips generated by the project, distribution of the project trips to roads outside the project, and projected future traffic conditions. A detailed description of the methodology is provided in **Appendix L.1** and summarized below.

The intersection LOS analysis is based on the traffic volumes observed during the peak hour conditions using traffic count data collected in March and May 2022 and January 2023. The following peak hours were selected for analysis:

- Weekday AM Peak Hour (peak hour between 7:00 AM and 9:00 AM)

- Weekday PM Peak Hour (peak hour between 4:00 PM and 6:00 PM)

Future year traffic forecasts were based on background (ambient) growth of 2% per year for 2024 traffic conditions. The total ambient growth was 4.04% for 2024 traffic conditions. Ambient growth was added to daily and peak hour traffic volumes on surrounding roadways, in conjunction with traffic generated by the development of future projects that have been approved but not yet built and/or for which development applications have been filed and which are under consideration by governing agencies.

Project trips were generated based on the rates collected by the Institute of Transportation Engineers (ITE) *Trip Generation Manual*, 11th Edition, 2021, additionally, in order to develop the traffic characteristics of the proposed project, trip-generation rates provided in the TUMF High-Cube Warehouse Trip Generation Study (WSP, January 29, 2019) were utilized. The purpose of the WSP 2019 study was to gather enough data to develop reliable trip generation rates for similar warehouse centers for use in traffic impact studies in the Inland Empire. The TA study area is illustrated in **Exhibit 4.13-1**.

Level of Service (LOS) is a measure of transportation system performance based upon the ratio of traffic volume relative to the capacity of the roadway or intersection. The volume-to-capacity ratio (V/C) indicates the overall performance of the roadway intersection and corresponds to a rating of A through F identifying its level of capacity utilization and relative level of congestion. LOS A represents free-flow traffic with little or no delay whereas LOS F represents a breakdown of traffic flow and a high incidence of delay. The volume-to-capacity ratio (V/C) is utilized to indicate the overall projected performance of the roadway intersection. Table **4.13-2** illustrates the LOS description for roadway Intersections.

Table 4.13-2 Intersection Level of Service Thresholds

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

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

Signalized Intersections

The City of Palm Springs requires signalized intersection operations analysis based on the methodology described in the Highway Capacity Manual (HCM). As noted above, intersection LOS operations are based on an intersection's average control delay. For signalized intersections LOS is

directly related to the average control delay per vehicle. A detailed description of the methodology used to calculate signal delay is contained in **Appendix L.1**.

TA Analysis Scenarios

In accordance with the City of Palm Springs's *Traffic Impact Analysis Guidelines*, the TA analyzed the following scenarios:

- Existing (2022) Conditions
- Existing plus Project Conditions.
- EAC (2024)
    - Existing (2022) volumes
    - Ambient growth traffic (4.04% over 2 years)
    - Cumulative development traffic
- EAPC (2024)
    - Existing (2022) volumes
    - Ambient growth traffic (4.04% over 2 years)
    - Cumulative development traffic
    - Project traffic

Signalized Intersections

The study area included in the TA is shown in **Exhibit 4.13-3, TIA *Intersection Analysis Locations***, and consists of 14 intersections.

Table 4.13-3 Intersection Analysis Locations

ID	Intersection Location	ID	Intersection Location
1	Indian Cyn. Dr. / Dillion Rd.	8	I-10 East Bound Ramps / Garnet Av.
2	Indian Cyn. Dr. / 19th Avenue	9	I-10 Westbound Ramps / 20th Av.
3	Indian Cyn. Dr. / Commercial Plaza	10	Newhall St. – Dwy. 4 / 19th Av.
4	Indian Cyn. Dr. / 20th Avenue	11	Indian Cyn. Dr. / Coachillin Wy.
5	Indian Cyn. Dr. / I-10 Westbound On-Ramp	12	Indian Cyn. Dr. / Dwy. 1
6	Indian Cyn. Dr. / I-10 Eastbound On-Ramp	13	Indian Cyn. Dr. / Dwy. 2
7	Indian Cyn. Dr. Garnet Ave.	14	Indian Cyn. Dr. / Dwy. 3

Source: N Indian Canyon/19th Ave High-Cube Warehouse Traffic Analysis, Table 1-1, Urban Crossroads March 2023.

Unsignalized Intersections

The City of Palm Springs requires that operations of unsignalized intersections be evaluated using the methodology described in the HCM. The LOS rating is based on the weighted average control delay expressed in seconds per vehicle. **Table 4.13-4:** Unsignalized Intersection Description of LOS identifies seconds of delay associated with differing levels of service.

Table 4.13-4 Unsignalized Intersection Description of LOS

Description	Average Control Delay Per Vehicle (Seconds)	Level of Service, V/C ≤ 1.0	Level of Service, V/C > 1.0
Little or no delays	0 to 10.00	A	F
Short traffic delays	10.01 to 15.00	B	F
Average traffic delays	15.01 to 25.00	C	F
Long traffic delays	25.01 to 35.00	D	F
Very long traffic delays	35.01 to 50.00	E	F
Extreme traffic delays with intersection capacity exceeded	> 50.00	F	F

Required Intersection Level of Service

Per City traffic study guidelines, **Table 4.13-5, R*equired Intersection Levels of Service*** and **Table 4.13-6, *Impact Criteria for Intersections Already Operating at LOS E or LOS F*** show the LOS criteria used in the analysis of the project.

Table 4.13-5 Required Intersection Levels of Service

Intersection Type	LOS Criteria
Signalized Intersection	LOS D or Better
All-Way Stop Controlled Intersection	LOS D or better for all critical movements
Cross-Street Stop Controlled Intersection	LOS E or better for the side street

Table 4.13-6 Impact Criteria for Intersections Already Operating at LOS E or LOS F

Significant Changes in LOS	
LOS E	An increase in delay of 2 seconds or more
LOS F	An increase in delay of 2 seconds or more

VMT Methodology

The **City Guidelines** are consistent with the VMT analysis methodology recommended by OPR. These guidelines were utilized to conduct the VMT analysis.

VMT thresholds are based on location and project type. The thresholds utilized are described below.

• Step 1: Transit Priority Area (TPA) Screening

Projects located within a Transit Priority Area (TPA) (i.e., within ½ mile of an existing "major transit stop"1 or an existing stop along a "high-quality transit corridor") may be presumed to have a less than significant impact absent substantial evidence to the contrary.

• Step 2: Low VMT Area Screening

Residential and office projects located within a low VMT generating area may be presumed to have a less than significant impact absent substantial evidence to the contrary. The analysis is based on review of the City-provided low VMT area map.

• Step 3: Project Type Screening

The City Guidelines identify that local serving uses and local essential services (e.g., local parks, day care centers, public schools, etc.) are presumed to have a less than significant impact absent substantial evidence to the contrary. The uses that can be presumed to have a less than significant impact generate less than 110 daily vehicle trips, which typically include 15,000 square feet of light industrial or 63,000 square feet of warehousing, among other unrelated uses.

City Guidelines identify RIVTAM or Riverside County Model (RIVCOM) as the appropriate tool for conducting VMT analysis. The initial step to prepare a project-level VMT analysis is to convert the Project's land use information into socio-economic data (SED) (i.e., employment) to be entered into the travel demand model. Adjustments to SED to represent the proposed project are made for the base year and cumulative models. Proposed Project generated VMT is calculated using the origin-destination (OD) trip matrices. The VMT is then normalized by dividing the project's service population (SP), which in this case is employment.

Consistent with City Guidelines, projects should also assess a project's potential effect on citywide VMT. This is referred to as cumulative effects. This analysis is performed using the boundary method, which includes all vehicle trips with one or both trip-ends within a specific geographic area of interest (i.e., the City of Palm Springs.) Once the areawide VMT value is calculated, it is then normalized by dividing by the service population in the City. If an increase occurs for the With Project condition as compared to Without Project condition, then the impact is considered significant.

Impact Analysis

a. Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadways, bicycle and pedestrian facilities.

The proposed project consists of an approximately 739,360 square feet Fulfillment Center located on the northwest corner of Indian Canyon Drive and 19th Avenue in the City of Palm Springs. The facility includes access on both Indian Canyon Drive and 19th Avenue, with truck traffic/access limited to 19th Avenue. There are two right-in/right-out access driveways and one full access driveway along Indian Canyon Drive for vehicular (non-truck) traffic. A full access driveway is proposed on 19th Avenue to be utilized by truck traffic only. Temporary impacts may occur during the construction of infrastructure improvements serving the project, including connection to a MSWD sewer line in 19th Avenue, approximately 600 feet east of the subject property. The project proposes to connect to the existing 16-inch water main located in 19th Avenue adjacent to the southern boundary.

Project Trip Generation

Table 4.13-7 shows the vehicle trip generation rates (actual) for the Project, as well as the vehicle trip generation summary with daily and peak hour trip generation estimates. As shown on **Table 4.13-7**, the Project is anticipated to generate a total of 1,574 vehicle trip-ends per day with 89 AM (actual) peak vehicle hour trips and 122 PM (actual) peak hour vehicle trips. This analysis assumes operations will be conducted 24 hours a day and 7 days a week to account for future users that may utilize those working hours as well as generating the most conservative analysis.

Table 4.13-7 Trip Generation Summary – Actual Vehicles

Trip Generation Rates									
Land Use	**Quantity[1]**		**AM Peak Hour**			**PM Peak Hour**			**Daily**
			In	**Out**	**Total**	**In**	**Out**	**Total**	
High-Cube Warehouse[2]	739.360	TSF	0.094	0.028	0.122	0.046	0.119	0.165	2.129
		Passenger Cars	0.079	0.024	0.103	0.040	0.104	0.144	1.750
		2 to 4-Axle Trucks	0.006	0.002	0.008	0.003	0.008	0.011	0.162
		5+ Axle Trucks	0.008	0.003	0.011	0.003	0.007	0.010	0.217
Trip Generation Results									
Land Use	**Quantity[1]**		**AM Peak Hour**			**PM Peak Hour**			**Daily**
			In	**Out**	**Total**	**In**	**Out**	**Total**	
High-Cube Warehouse	739.360	TSF							
-Passenger Cars			58	18	76	30	77	107	1,294
-Truck Trips									
2 to 4-Axle Trucks			4	1	5	2	6	8	120
5+-Axle Trucks			6	2	8	2	5	7	160
-Net Truck Trips (Actual Vehicles)			10	3	13	4	11	15	280
Total Trips (Actual Vehicles)[3]			**68**	**21**	**89**	**34**	**88**	**122**	**1,574**

Source: N Indian Canyon/19th Ave High-Cube Warehouse Traffic Analysis, Table 4-1, Urban Crossroads March 2023.

Notes:

1. TSF = Thousand Square Feet
2. Source: TUMF High-Cube Warehouse Trip Generation Study. Prepared by WSP, January 2019. AM/PM peak hour (in/out) splits are estimated from ITE (High-Cube Transload & Short-Term Storage Warehouse)
3. High-Cube Warehouse Subtotal (Actual Vehicles) = Passenger Cars + Net Truck Trips (Actual Trucks).

Table 4.13-8 presents the passenger-car-equivalent (PCE) trip generation rates for the Project with the resulting PCE daily and peak hour trip generation estimates. The Project is anticipated to generate a total of 2,134 PCE vehicle trip-ends per day with 118 AM (PCE) peak vehicle hour trips and 155 PM (PCE) peak hour vehicle trips.

Table 4.13-8 Trip Generation Summary – Passenger Car Equivalents (PCE)

Trip Generation Rates									
Land Use	**Quantity[1]**		**AM Peak Hour**			**PM Peak Hour**			**Daily**
			In	**Out**	**Total**	**In**	**Out**	**Total**	
High-Cube Warehouse[2]	739.360	TSF	0.121	0.039	0.160	0.058	0.149	0.144	2.887
		Passenger Cars	0.079	0.024	0.103	0.040	0.104	0.144	1.750
		2 to 4-Axle Trucks (PCE = 3.0)[3]	0.018	0.006	0.024	0.009	0.024	0.033	0.486
		5+ Axle Trucks (PCE = 3.0)[3]	0.024	0.009	0.033	0.009	0.021	0.030	0.651
Trip Generation Results									
Land Use	**Quantity[2]**		**AM Peak Hour**			**PM Peak Hour**			**Daily**
			In	**Out**	**Total**	**In**	**Out**	**Total**	
High-Cube Warehouse[2]	739.360	TSF							
-Passenger Cars			58	18	76	30	77	107	1,294
-Truck Trips									
2 to 4-Axle Trucks (PCE = 3.0)			13	4	17	7	18	25	359
5+-Axle Trucks (PCE = 3.0)			18	7	25	7	16	23	481
-Net Truck Trips (PCE)[3]			31	11	42	14	34	48	840
Total Trips (PCE)[4]			**89**	**29**	**118**	**44**	**111**	**155**	**2,134**

Source: N Indian Canyon/19th Ave High-Cube Warehouse Traffic Analysis, Table 4-1, Urban Crossroads March 2023.

Notes:

1. TSF = Thousand Square Feet
2. Source: TUMF High-Cube Warehouse Trip Generation Study. Prepared by WSP, January 2019.
   AM/PM peak hour (in/out) splits are estimated from ITE (High-Cube Transload & Short-Term Storage Warehouse).
3. PCE = Passenger Car Equivalent
   The County of Riverside TIA & VMT Guidelines (December 2020) provide the following PCE factors: 2-axle = 1.5; 3-axle = 2.0; 4+ axle = 3.0.
   Since the WSP study does not provide a breakdown between the 2 to 4-axle trucks, the highest PCE factor of 3 has been utilized.
4. High-Cube Warehouse Subtotal (Actual Vehicles) = Passenger Cars + Net Truck Trips (PCE).

TA Development Scenarios and Analysis

Existing Traffic Conditions without Project

As described in **Table 4.13-1,** Intersection Analysis for Existing (2022) Intersection Operations and illustrated in **Exhibit 4.13-1**, TA Study Area., the existing operations analysis indicates that 10 of the 11 existing study area intersections are currently operating at an acceptable LOS (LOS D or better) during the peak hours. One intersection (Indian Canyon Drive and 19th Avenue) is operating at LOS F during the evening peak hour, which General Plan policy classifies as an unacceptable LOS. However, the addition of a Traffic Signal at this intersection would result in acceptable conditions. **Table 4.13-9** includes the traffic signal that is currently proposed at this intersection to address anticipated traffic delay expected with or without the project, however it is a "future" improvement.

Table 4.13-9 Intersection Analysis for Existing (2022) Intersection Operations And Future Planned Improvement

ID	Intersection	Traffic Control[1]	Delay (in seconds)[2]		Level of Service	
			AM	PM	AM	PM
1	Indian Canyon Dr./Dillon Rd.	TS	30.0	27.6	C	C
2	Indian Canyon Dr./19th Ave.	CSS	26.9	65.5	D	**F**
	-Future Planned Improvement	TS	7.9	9.1	A	A
3	Indian Canyon Dr./Commercial Plaza	CSS	13.6	15.7	B	C
4	Indian Canyon Dr./20th Ave.	TS	21.5	24.8	C	C
5	Indian Canyon Dr./1-10 WB On-Ramp	UNC	0	0	A	A
6	Indian Canyon Dr./I-10 EB On-Ramp	UNC	0	0	A	A
7	Indian Canyon Dr./Garnet Ave.	TS	27.4	21.8	C	C
8	I-10 EB Ramps/Garnet Ave.	TS	31.9	29.8	C	C
9	I-10 WB Ramps/20th Ave.	TS	22.9	22.2	C	C
10	Newhall St. – Dwy. 4/19th Ave	CSS	8.6	8.7	A	A
11	Indian Canyon Dr./Coachillin	TS	3.0	6.4	A	A
12	Indian Canyon Dr./Dwy. 1	Future Intersection				
13	Indian Canyon Dr./Dwy. 2	Future Intersection				
14	Indian Canyon Dr./Dwy. 3	Future Intersection				

Source: N. Indian Canyon and 19 Ave. High-Cube Warehouse Traffic Analysis, Table 3-1, Urban Crossroads, March 2023.
Notes:

1. TS = Traffic Signal; CSS = Cross-street Stop; AWS = All-Way Stop; UNC = Uncontrolled
2. Per the Highway Capacity Manual 6th Addition (HCM6) , overall average intersection delay and level of service are shown for intersections with a traffic signal or all way stop control. For intersections with cross street stop control, the delay and level of service for the worst individual movement (or movements sharing a single lane) are shown.

Existing Plus Project (E+P) Conditions

As shown in **Table 4.13-10**, installation of traffic signal at the off-site deficient intersection of Indian Canyon Drive / 19th Avenue (#2) addresses intersection operational deficiencies for Existing plus Project conditions. With the addition of a traffic signal and project trips, the intersection of Indian Canyon and 19th Avenue operates at LOS A, consistent with City policy.

Table 4.13-10 Intersection Analysis for Existing Plus Project (E+P) Conditions

ID#	Intersection	Traffic Control[1]	Delay (in seconds)[2]		Level of Service[2]	
			AM	PM	AM	PM
1	Indian Canyon Dr. / Dillion Road	TS	30.3	27.6	C	C
2	Indian Canyon Dr. / 19th Av.	CSS	27.6	68.3	D	**F**
	- With Improvements	TS	7.9	9.1	A	A
3	Indian Canyon Dr. / Commercial Plaza	CSS	14.2	16.2	B	C
4	Indian Canyon Dr. / 20th Av.	TS	22.5	25.6	C	C
5	Indian Canyon Dr. / I-10 WB On-Ramp	UNC	0.0	0.0	A	A
6	Indian Canyon Dr. / I-10 EB On-Ramp	UNC	0.0	0.0	A	A
7	Indian Canyon Dr. / Garnet Av.	TS	27.9	22.0	C	C
8	I-10 EB Ramps / Garnet Av.	TS	31.9	31.1	C	C
9	I-10 WB Ramps / Garnet Av.	TS	23.2	22.5	C	C
10	Newhall St. – Dwy. 4 / 19th Av.	CSS	8.7	8.9	A	A
11	Indian Canyon Dr. / Coachillin	TS	3.0	6.5	A	A
12	Indian Canyon Dr. / Dwy. 1	CSS	13.4	10.2	B	B
13	Indian Canyon Dr. / Dwy. 2	CSS	18.4	13.2	C	B
14	Indian Canyon Dr. / Dwy. 3	CSS	13.4	10.4	B	B

Source: N Indian Canyon/19th Ave High-Cube Warehouse Traffic Analysis, Table 5-1, Urban Crossroads March 2023.

Notes:

1. TS = Traffic Signal; CSS = Cross-street Stop; UNC = Uncontrolled
2. Per the Highway Capacity Manual (6th Edition), overall average intersection delay and level of service are shown for intersections with a traffic signal or all way stop control. For intersections with cross street stop control, the delay and level of service for the worst individual movement (or movements sharing a single lane) are shown.

Future Traffic Conditions with Project

Future "without project" traffic conditions (EAC) were evaluated, to include existing traffic, ambient growth, and other developments in the area. Future "with project" conditions (EACP) analyzed project traffic plus ambient growth plus cumulative projects – those projects planned to occur which would also contribute to opening year traffic on study area intersections. A list of these projects and the trips they are anticipated to generate is provided in **Table 4.13.-11**.

Table 4.13-11 Cumulative Development Trip Generation Summary

ID	Project Name	Land Use[1]	Quantity	Units[2]
1	Angel View Salvage & Recycling Facility	Gen. Light Industrial	13.650	TSF
		Factory Outlet Center	9.000	TSF
		General Office	3.600	TSF
2	Cultivation Center	Nursery (Wholesale)	38.00	AC
3	Coachillin	Marijuana Cultivation and Processing Facility	2,772.487	TSF
		Commercial/Dispensary/Restaurant	27.513	TSF
		Coachillin Subtotal	2,800.000	TSF
4	Blackstar Industrial Properties	Business Park	621.920	TSF
5	DHS Light Industrial w/ Cannabis Overlay	Marijuana Cultivation and Processing Facility	116.00	TSF
6	Palm Springs Business Park	Business Park	37.874	TSF
7	Skyborne Active Adult Community at Stoneridge	Senior Adult Housing – Detached Passive Parks	1,141	DU
		SFDR	801	DU
		Clubhouse	5.000	TSF
8	Vista Rosa Residential (Phase 1)	Senior Adult Housing – Detached	702	DU
		Passive Parks	21.78	AC
9	PM32692	SFDR	3	DU
10	Oxford Properties Cultivation Center	Nursery (Wholesale)	70.26	AC
11	Desert Gateway	High-Cube Warehouse	1,059.240	TSF
		Hotel	150	OCC RM
		Commercial Retail	42.00	TSF

Source: N Indian Canyon/19th Ave High-Cube Warehouse Traffic Analysis, Table 4-3, Urban Crossroads March 2023.

Notes:

1. SFDR = Single Family Detached Residential
2. DU = Dwelling Unit; TSF = Thousand Square Feet; AC = Acre; OCC RM = Occupied Room

Opening Year Intersection Operations Analysis

In order to assess whether the project would significantly impact the roadway system, an analysis was conducted which assumed that the project would be operational in 2024.

The analysis assumes that the project would build out adjacent roadways and traffic controls under opening year conditions, consistent with the City of Palm Springs General Plan buildout intersection configurations.

LOS calculations were conducted for the study area intersections to evaluate their operations under 2024 conditions with an ambient growth factor and the cumulative projects described in **Table 4.13-11** above. The intersection analysis results are summarized in **Table 4.13-12.**

EAC (2024) Traffic Conditions

Without the proposed project, installation of traffic signal at Indian Canyon Drive / 19th Avenue (#2) addresses intersection operational deficiencies for EAC (2024) conditions, as shown in **Table 4.13-12**. As shown in the Table, all other study area intersections operate at LOS D or better, consistent with General Plan policy.

Table 4.13-12 Intersection Analysis for EAC (2024) Conditions

ID#	Intersection	Traffic Control[1]	Delay (in seconds)[2]		Level of Service	
			AM	PM	AM	PM
1	Indian Canyon Dr. / Dillion Road	TS	37.4	33.7	D	C
2	Indian Canyon Dr. / 19th Av.	CSS	>80	>80	**F**	**F**
	- With Improvements	**TS**	8.4	12.3	A	B
3	Indian Canyon Dr. / Commercial Plaza	CSS	22.0	29.9	C	D
4	Indian Canyon Dr. / 20th Av.	TS	26.8	31.6	C	C
5	Indian Canyon Dr. / I-10 WB On-Ramp	UNC	0.0	0.0	A	A
6	Indian Canyon Dr. / I-10 EB On-Ramp	UNC	0.0	0.0	A	A
7	Indian Canyon Dr. / Garnet Av.	TS	30.5	28.2	C	C
8	I-10 EB Ramps / Garnet Av.	TS	32.9	35.1	C	D
9	I-10 WB Ramps / Garnet Av.	TS	23.4	23.1	C	C
10	Newhall St. – Dwy. 4 / 19th Av.	CSS	8.8	8.9	A	A
11	Indian Canyon Dr. / Coachillin	TS	5.6	14.0	A	B
12	Indian Canyon Dr. / Dwy. 1	Future Intersection				
13	Indian Canyon Dr. / Dwy. 2	Future Intersection				
14	Indian Canyon Dr. / Dwy. 3	Future Intersection				

Source: N Indian Canyon/19th Ave High-Cube Warehouse Traffic Analysis, Table 6-1, Urban Crossroads March 2023.

Notes:

1. TS = Traffic Signal; CSS = Cross-street Stop; UNC = Uncontrolled
2. Per the Highway Capacity Manual (6th Edition), overall average intersection delay and level of service are shown for intersections with a traffic signal or all way stop control. For intersections with cross street stop control, the delay and level of service for the worst individual movement (or movements sharing a single lane) are shown.

EAPC (2024) Traffic Conditions

The analysis then added the proposed project to opening year conditions. As shown in **Table 4.13-13**, the Indian Canyon 19th Avenue intersection operates at an unacceptable LOS with the addition of the project. In order to meet the City's LOS standard, the signal is required. All other study area intersections operate at an acceptable LOS with the addition of the project. Based on this analysis, although the proposed project will contribute to unacceptable conditions at the Indian Canyon/19th Avenue intersection, the failure of the intersection will occur regardless of the project, and the project's impact will be mitigated by the payment of an lieu fee equivalent to the project's fair share of 7.9%, see **Table 4.13-14**, which the City will condition the project to contribute as part of the Major Development Permit.

Table 4.13-13 Intersection Analysis for EAPC (2024) Conditions

ID#	Intersection	Traffic Control[1]	Delay (in seconds)[2]		Level of Service	
			AM	PM	AM	PM
1	Indian Canyon Dr. / Dillion Road	TS	38.0	34.5	D	C
2	Indian Canyon Dr. / 19th Av.	CSS	>80	>80	F	F
	- With Improvements	TS	11.0	19.0	B	B
3	Indian Canyon Dr. / Commercial Plaza	CSS	23.2	31.2	C	D
4	Indian Canyon Dr. / 20th Av.	TS	27.2	33.0	C	C
5	Indian Canyon Dr. / I-10 WB On-Ramp	UNC	0.0	0.0	A	A
6	Indian Canyon Dr. / I-10 EB On-Ramp	UNC	0.0	0.0	A	A
7	Indian Canyon Dr. / Garnet Av.	TS	30.7	28.9	C	C
8	I-10 EB Ramps / Garnet Av.	TS	33.0	40.6	C	D
9	I-10 WB Ramps / Garnet Av.	TS	23.8	23.4	C	C
10	Newhall St. – Dwy. 4 / 19th Av.	CSS	9.0	9.1	A	A
11	Indian Canyon Dr. / Coachillin	TS	5.8	14.5	A	B
12	Indian Canyon Dr. / Dwy. 1	CSS	17.7	13.7	C	B
13	Indian Canyon Dr. / Dwy. 2	CSS	30.7	24.0	D	C
14	Indian Canyon Dr. / Dwy. 3	CSS	17.8	14.2	C	**B**

Source: N Indian Canyon/19th Ave High-Cube Warehouse Traffic Analysis, Table 7-1, Urban Crossroads March 2023.

Notes:

1. TS = Traffic Signal; CSS = Cross-street Stop; UNC = Uncontrolled
2. Per the Highway Capacity Manual (6th Edition), overall average intersection delay and level of service are shown for intersections with a traffic signal or all way stop control. For intersections with cross street stop control, the delay and level of service for the worst individual movement (or movements sharing a single lane) are shown.

Table 4.13-14 Existing Plus Ambient Plus Project Plus Cumulative (2024) Fair Share Calculations

#	Intersection	Existing Traffic	EAPC (2024) Traffic[3]	Project Only Traffic	Total New Traffic[1]	Project Fair Share (%)[2]
2	Indian Canyon Dr. / 19th Av.					
	• AM Peak Hour	1,583	2,770	93	1,187	7.8%
	• PM Peak Hour	1,557	3,092	122	1,535	**7.9%**

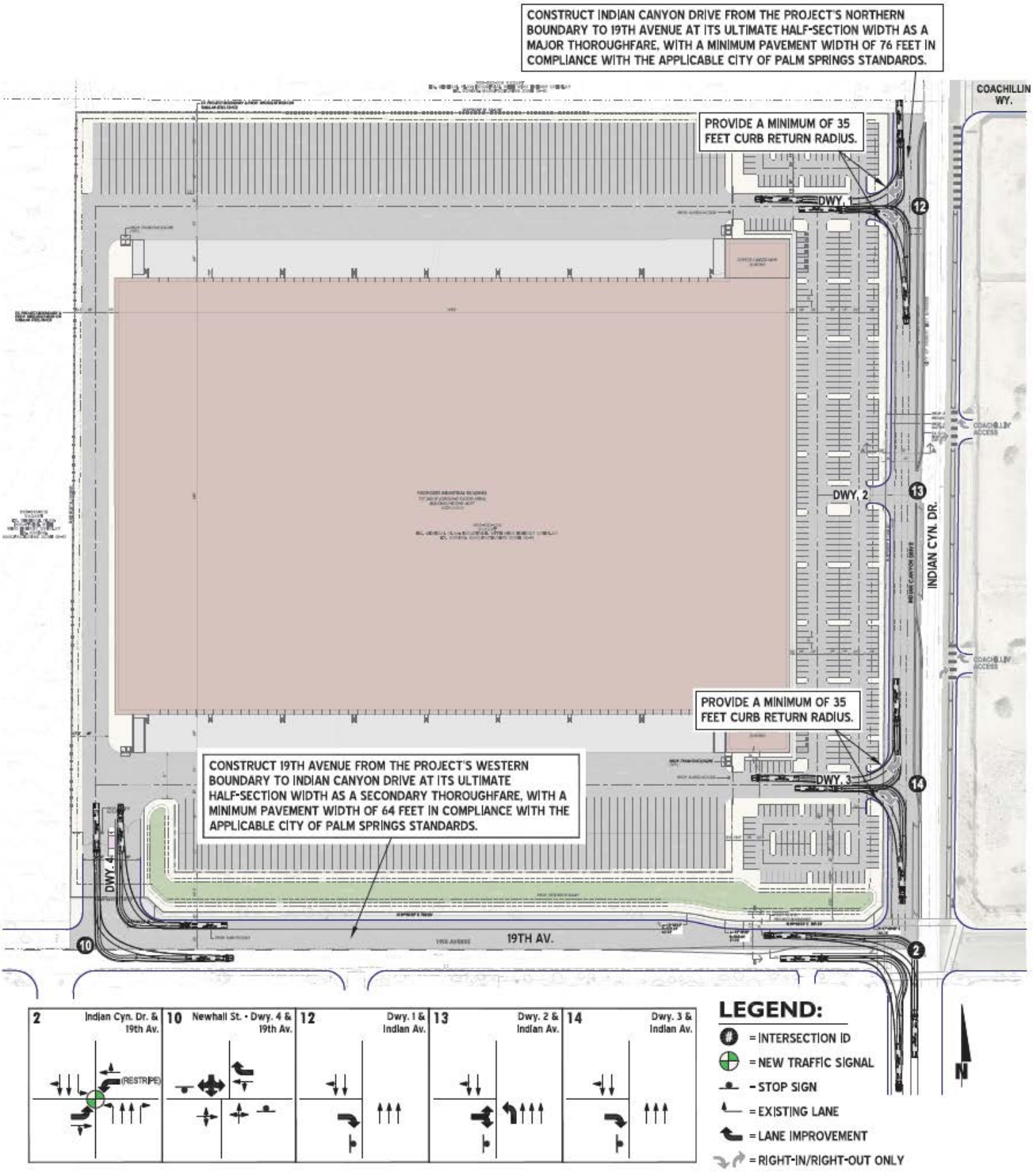
[1] Total New Traffic = (EAPC 2024 - Existing Traffic)
[2] Project Fair Share % = (Project Only Traffic / Total New Traffic)
[3] Existing Plus Ambient Plus Project Plus Cumulative (2024) Conditions

Traffic Signal Warrant Analysis

Traffic signal warrant analyses have been performed at all applicable unsignalized study area intersections for build out conditions. As noted previously a traffic signal is required at the intersection of 19th Avenue and Indian Canyon Drive. With this improvement all study intersections will operate at acceptable LOS.

Project Improvements

As described above, the project will be required, as conditions of approval, to make adjacent roadway improvements and on-site circulation design improvements. These are displayed in **Exhibit 4.13-2**.



MSA CONSULTING, INC.
> PLANNING > CIVIL ENGINEERING > LAND SURVEYING

RECOMMENDED ROAD IMPROVEMENTS
PALM SPRINGS FULFILLMENT CENTER
EXHIBIT 4.13-2

Transit Service

The City of Palm Springs is currently served by the SunLine Transit Agency, but there is no bus service currently serving the project study area. Transit service is reviewed and updated by the SunLine Transit Agency periodically to address ridership, budget and community demand needs. Changes in land use can affect these periodic adjustments which may lead to either enhanced or reduced service where appropriate.

As the area builds out, Sunline Transit will continue to coordinate with area cities to address updated transit needs. The Agency's outreach to its current ridership and other resources in the community means that additional routes may become available as the number of potential users in the area increases. Additional routes would serve the employees of the project and other developments in the vicinity to provide connectivity to the greater Coachella Valley.

Therefore, because SunLine does not currently serve the project study area, there will be no impacts to SunLine services or facilities and the project will not otherwise interfere with implementation of SunLine transit network.

Non-motorized Transportation Facilities

The proposed project includes pedestrian and bicycle facilities distributed throughout the proposed development. Sidewalks and bike lanes will be provided along Indian Canyon Drive. A sidewalk will be provided along 19th Avenue adjacent to the project site.

The existing conditions of sidewalk and bicycle systems are fragmented. Project improvements will add to the existing sidewalk and bicycle system in the area. As the area builds out, future projects will be required to construct General Plan improvements to sidewalks and bicycle facilities and will provide future connectivity to the surrounding area including Palm Springs and Desert Hot Springs for project users.

In summary, the proposed project provides a bike path and sidewalks as designated in the General Plan. Therefore, the project will not conflict with any City program, plan, ordinance or policy regarding multi-modal transportation.

b. Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?

The California Environmental Quality Act (CEQA) procedures for determination of transportation impacts are based on an evaluation of Vehicle Miles Traveled (VMT). Consistent with the methodology described above, the project was analyzed for VMT impacts using the City's adopted policy. First, the screening tool was considered, as follows:

Step 1: TPA Screening

The project is not within an existing TPA or high-quality-transit corridor, so the Project does not screen out under Step 1.

Step 2: Low VMT Area Screening

According to review of the City-provided low VMT area map, the project is not found in a low VMT area. The project does not screen out under Step 2.

Step 3: Project Type Screening

The project includes 739,360 SF of high-cube warehouse uses and does not meet the requirement for local serving uses and local essential services that generate less than 110 daily vehicle trips. The project does not screen out under step 3.

Screening Conclusion

A project level VMT analysis is required because the screening criteria have not been met.

The Palm Springs Guidelines identify the Riverside County Transportation Analysis Model (RIVTAM) as the appropriate tool for conducting VMT analysis for land use projects. RIVTAM considers interaction between different land uses based on socio-economic data such as population, households and employment.

Project VMT was calculated using the most current version of RIVTAM. Adjustments in socioeconomic data (SED) (i.e., employment) were made to the specific Traffic Analysis Zone (TAZ) within the RIVTAM model to reflect the project's proposed population and employment uses.

Table 4.13-15 summarizes the service population (SP) estimates for the project.

Table 4.13-15 Proposed Project Employment Estimate

Land Use	Estimated Service Population
High-Cube Warehouse	718

Source: N Indian Canyon/19th Ave High-Cube Warehouse VMT Analysis, Table 1, Urban Crossroads January 2023.

Project VMT Calculation

Table 4.13-16 presents the key inputs for the calculation of project generated VMT per SP, resulting in a project generated VMT of 59.77 for baseline and 52.24 for cumulative conditions.

Table 4.13-16 Proposed Project VMT per Service Population

	Baseline	Cumulative
Project Generated VMT	42,918	37,511
Service Population	718	718
VMT per Service Population	59.77	52.24

Source: N Indian Canyon/19th Ave High-Cube Warehouse VMT Analysis, Table 2, Urban Crossroads January 2023.

Table 4.13-17 illustrates a comparison between the proposed project's Baseline VMT per SP to the City's adopted threshold. The proposed project's baseline and cumulative VMT per Service Population are greater than the City's impact threshold of 34.52 VMT per SP, representing a significant impact.

Table 4.13-17 Proposed Project Generated VMT per SP Comparison

	Baseline	Cumulative
City VMT per SP Threshold	34.52	34.52
Project VMT per SP	59.77	52.24
Potentially Significant	Yes	Yes

Source: N Indian Canyon/19th Ave High-Cube Warehouse VMT Analysis, Table 3, Urban Crossroads January 2023.

Palm Springs General Plan Circulation Element Policy CR1.11 encourages large employers (employers with 100 or more persons) to adopt incentive programs that include ridesharing, fleet vehicles and vanpools, preferential parking for rideshares, subsidized shuttle bus services, telecommuting, alternative work hour programs, bicycle racks, lockers and shower rooms, and information on transit services to reduce overall traffic volumes in the City.

The Applicant will implement, as shown in **Mitigation Measure TRA-1**, a VMT Reduction Program that includes the following reduction measures:

- Implement a ridesharing program,
- Provide preferential parking for rideshares,
- Provide opportunities for telecommuting,
- Implement alternative work hour programs and
- Construct on-site bicycle racks and associated facilities.

The proposed measures would result in the following range of reductions:

- Implement a ridesharing program and provide preferential parking for rideshares: 0-8%
- Provide opportunities for telecommuting/ alternative work hour programs: Not Quantified
- Construct on-site bicycle racks, lockers, and shower rooms: 0-4.4%

This measure is appropriate for reducing VMT, however any associated reductions are not anticipated to result in a project VMT that is considered less than significant. Utilizing the maximum reductions available a 12.4% reduction would result in a Baseline VMT per SP of 52.38 and a Cumulative VMT per SP of 45.76. Both numbers would continue to exceed the City threshold of 34.52 VMT per SP for both baseline and cumulative conditions. The future occupant of the project will be required to implement these measures; however, significant impacts are still anticipated.

c. Substantially increase hazards due to a geometric design feature or incompatible uses

The two major streets accessing the site will be Indian Canyon Drive along the project's eastern boundary and 19th Avenue along the project's southern boundary. The project's circulation system will be designed for motor vehicles as well as pedestrians and will comply with the City of Palm Springs standards for road development. Project design will include adequate stacking distances and lines of sight at gated entries per Municipal Code 93.05.00, Vehicular access and 93.06.00, Off-street parking.

Proposed landscape and signage design will be reviewed to ensure that lines of sight are not impeded. All onsite design will require review and approval by the City of Palm Springs and the City Fire Department to assure accessibility of emergency vehicles within the project.

Temporary impacts may occur during the construction of infrastructure improvements serving the project, including connection to a MSWD sewer line in 19th Avenue, approximately 600 feet east of the subject property. The project proposes to connect to the existing 16-inch water main located in 19th Avenue adjacent to the southern boundary. Construction of the project's and off-site infrastructure improvements could cause short-term impacts related to traffic flows as a result of temporary lane closures. To minimize potential temporary traffic flow impacts during construction, a detailed construction traffic management plan(s) must be prepared and submitted to the City of Palm Springs **(TRA-2).** Plans shall include street closure information, detour plans, haul routes, and staging plans as necessary for any off-site work that would encroach on public right-of-way. Offsite improvements including the sewer extension will undergo review by MSWD and City of Desert Hot Springs, including the issuance of encroachment permits where required. The project must implement any applicable design standards relative to each agency. Without implementation of a traffic control plan and encroachment permits, impacts associated with increased hazards could be significant. Review and approval of project plans by the applicable agencies will ensure that no hazardous geometric design features are included in site design. The project is similar to existing industrial land uses in the area and will not include incompatible uses as required by the Municipal Code. **Mitigation Measure TRA-2** would substantially reduce the temporary short-term construction related traffic impacts to a less than significant level. Impacts relative to hazards due to a geometric design feature or incompatible use are less than significant.

d. Result in Inadequate Emergency Access

Project construction will ensure adequate access at all times, and that complete and adequate public facilities and services are in place and available for the emergency responders and employees to the facility. This includes fire department approved emergency roadway design and facilities including fire hydrants.

City staff, including Police and Fire Department staff, would review site plans and provide conditions of approval that are specific to the provision of emergency access. Per the General Plan Safety Element, the project is not located on any of the four main points of roadway access (lifelines) to the City. Additionally, **Mitigation Measure TRA-2** Traffic Control Plan will ensure that streets remain accessible for emergency purposes. The development is not anticipated to impact the evacuation plan and routes within the region Additionally, all roadway design shall be reviewed and approved by the City and Fire Department. With implementation of the mitigation measure and standard conditions, including roadway design review and approval, impacts associated with the emergency access impacts would be less than significant.

Less than significant impacts are anticipated following implementation of Mitigation Measure TRA-2 payment of DIF and implementation of regulatory requirements relative to CEQA Thresholds a., c., and d. The project will not exceed local thresholds regarding implementation of other applicable plans, hazardous design elements or emergency access. **Mitigation Measure TRA-1** will be required for CEQA Threshold b. VMT Impacts, however impacts will remain significant and unavoidable.

4.13.5 Cumulative Impacts

The project is being developed in an area of the City and the region that is still urbanizing. Vacant lands in Palm Springs and Desert Hot Springs are designated for industrial and commercial uses, and will generate additional traffic on area roadways. However, these future projects will be required to analyze their traffic impacts, and will be required to comply with the City's policies relating to level of service. The level of impact and mitigation measures, if required, will be developed specific to these projects as they occur. Similar to the proposed project, future projects will be required to pay DIF fees and contribute to intersection improvements to assure adequate LOS at City intersections. As a result, and as analyzed in the General Plan EIR, area roadways will operate at acceptable levels through build out of the General Plan, and the project and other projects will not have cumulatively considerable impacts on traffic flow.

Project Employment Impact on Cumulative VMT Impacts

Consistent with City Guidelines, projects should also assess a project's potential effect on citywide VMT. Baseline and cumulative link-level boundary VMT per SP City-wide was calculated for both No Project and With Project conditions. If an increase were to occur for the With Project condition as compared to Without Project condition, then the impact would be considered significant. As shown in **Table 4.13-18**, citywide VMT per SP was not found to increase under cumulative conditions. As a result, cumulative VMT impacts were determined to be less than significant.

Table 4.13-18 Proposed Project Citywide VMT per Service Population

	Baseline		Cumulative	
	Without Project	**With Project**	**Without Project**	**With Project**
SP	80,391	81,109	103,771	104,489
VMT	926,023	928,363	1,303,015	1,304,457
VMT per SP	11.52	11.45	12.56	12.48
Change in VMT/SP	-0.07		-0.08	
Potentially Significant?	No		No	

Source: N Indian Canyon/19th Ave High-Cube Warehouse VMT Analysis, Table 4, Urban Crossroads January 2023.

As noted previously the proposed project's baseline and cumulative VMT per Service Population are greater than the City's impact threshold, representing a significant impact. Therefore, this impact remains significant and unavoidable.

Mitigation Measure TRA-1 shall be incorporated into the project to reduce impacts associated with VMT. The Applicant will implement a VMT Reduction Program that includes the following operational measures: Implement a ridesharing program and provide preferential parking for rideshares; provide opportunities for telecommuting/alternative work hour programs; and construct on-site bicycle racks, and associated facilities.

4.13.6 Mitigation Measures

The following required improvements are presented in the TA and will be implemented by fee payments (DIF, CIP and TUMF) that will address the project's fair share of these improvements. As noted previously, the project will be required to construct the improvements to adjacent half streets. Improvements are a combination of General Plan Circulation Element mandated improvements as well as modified improvements identified in the TA to be applied to the project as conditions of approval.

Payment of DIF to be directed toward construction of the following improvements are required prior to occupancy of the proposed project:

- ***Indian Canyon Drive/19th Avenue***
    - Install a traffic signal.
    - Provide separate eastbound left turn lane.
    - Modify westbound striping to provide a dedicated left turn lane.
- ***Driveway 4/19th Avenue***
    - Install a cross-street stop control on the southbound approach
    - Provide one southbound shared left-through-right lane
    - Proposed site plan incorporates and extended westbound right turn storage area for the staging of entering trucks.
- ***Indian Canyon Drive/Driveway 1***
    - Restrict left turn movements to/from Indian Canyon Drive by providing a double yellow line median striping from the Coachillin Way intersection to 300' south of Driveway 1
    - Provide single eastbound right turn lane within driveway with cross street stop control.
- ***Indian Canyon Drive / Driveway 2***
    - Provide 150' northbound left turn lane within striped median of Indian Canyon Drive.
    - Provide one eastbound shared left-right turn lane with cross-street stop control.
- ***Indian Canyon Drive / Driveway 3***
    - Restrict left turn movements to/from Indian Canyon Drive by providing double solid yellow line median striping from the 19th Avenue intersection to north of Driveway 3.
    - Provide single eastbound right turn lane within driveway with cross-street stop control.

The following Mitigation Measures will be implemented by the project to mitigate VMT Impacts to the extent possible. This measure is appropriate for reducing VMT, however any associated reductions are not anticipated to result in a project VMT that is considered less than significant. The future occupants will be required to implement these measures; however, significant impacts are still anticipated.

TRA-1: VMT Reduction Program

The Applicant will implement a VMT Reduction Program during operations which includes the following measures:

- Implement a ridesharing program and provide preferential parking for rideshares.
- Provide opportunities for telecommuting/ alternative work hour programs.
- Construct on-site bicycle racks, lockers and shower rooms.

The following Mitigation Measure will be implemented by the project to mitigate Impacts associated with Hazardous conditions.

TRA-2: Traffic Control Plan

Prior to construction of any project related improvements, including offsite utilities and/ or issuance of a grading permit, the applicant shall prepare and submit the City of Palm Springs for review and approval detailed construction traffic management plans, including street closure information, detour plans, haul routes, and staging plans as necessary for any off-site work that would encroach on public right-of-way. The construction traffic management plans shall include the following elements, as appropriate:

- Provisions for temporary traffic control during all construction activities adjacent to public right-of-way to improve traffic flow on public roadways (e.g., flag person);
- Construction-related vehicles shall not park on surrounding public streets;
- Provision of safety precautions for pedestrians and bicyclists through such measures as alternate routing and protection barriers;
- Schedule construction-related deliveries to reduce travel during peak travel periods;
- Obtain the required permits for truck haul routes from the County of Riverside and the City of Desert Hot Springs prior to the issuance of any permit for the project; and
- Obtain a Caltrans transportation permit for use of oversized transport vehicles on Caltrans facilities.

- Outline adequate measures to ensure emergency vehicle access during all aspects of the project's construction, including, but not limited to, the use of flagmen during partial closures to streets surrounding the project site to facilitate the traffic flow until construction is complete.

- Include the implementation of security measures during construction in areas that are accessible to the general public to help reduce any increased demand on law enforcement services, including fencing construction areas, providing security lighting, and providing security personnel to patrol construction sites.

4.13.7 Level of Significance After Mitigation

With implementation of existing regulations and standards, and **Mitigation Measure TRA-2,** potential impacts associated with policy and plan compliance, hazardous design elements or emergency access would be reduced to less than significant levels.

Regarding CEQA Threshold "b", modeling of VMT for the Project based upon City of Palm Springs guidelines indicates a potentially significant impact. This will be the case even if Mitigation Measure **Mitigation Measure TRA-1** is considered after the modeling process. Mitigation would reduce Baseline VMT from 59.77 VMT/SP to 52.36 VMT/SP and Cumulative VMT from 52.24 VMT/SP to 45.76 VMT/SP (maximum possible reductions). However, the estimated VMT/SP would remain higher than the City's VMT threshold of 34.52 VMT/SP for Baseline conditions and 34.52 VMT/SP for Cumulative conditions and VMT impact.

Therefore, a significant unavoidable adverse impact related to VMT has been identified.

4.13.8 Resources

1. N. Indian Canyon High Cube Warehouse Traffic Analysis (Urban Crossroads, March 1, 2023).
2. N. Indian Canyon High Cube Warehouse Vehicle Miles Traveled (VMT) Analysis (Urban Crossroads, January 9, 2023.
3. Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity (California Air Pollution Control Officers Association, December 2021)

4.14.1 Tribal Cultural Resources

4.14.2 Introduction

This section discusses the Tribal Cultural Resources that may be present in the project site and assesses potential impacts on these resources from the implementation of the proposed project. Descriptions and analysis in this section are based on information contained in the *Cultural Resources Assessment* prepared by Statistical Research, Inc. (SRI) (February 2023), and the City of Palm Springs *Recreation, Open Space & Conservation Element* and the Native American Tribal Consultation undertaken by the City of Palm Springs, as required under Assembly Bill 52 (AB52). This section discusses the Tribal resources that may be present in the project site or in the vicinity and assesses impacts on these resources from the development associated with implementation of the project. The cultural resources report is included in the Appendices of this Draft EIR (**Appendix E,** *Cultural Report*). Correspondence regarding Tribal consultation under AB52 and SB18 is also included in **Appendix E**.

4.14.3 Existing Conditions

Current Natural Setting

The project site encompasses approximately 38 acres located in the northwest corner of Indian Canyon Drive and 19th Avenue in the City of Palm Springs. The project area is vacant and undeveloped land consisting of mostly of creosote scrub bush, brittlebush and various desert grasses. A series of off-highway vehicles trails cross the landscape, and as a result much of the project area exhibits some degree of surface disturbance. The project area is at an elevation of approximately 780 feet above mean sea level. The surface soil consists of sandy.

Ethnohistoric and Historic Context

The aboriginal group that occupied the northern Coachella Valley during the historical period was the Desert Cahuilla, who, along with the Mountain and Pass Cahuilla, constituted the ethnographic Cahuilla. The Cahuilla spoke the language of the Takic branch of Northern Uto-Aztecan and the Desert Cahuilla spoke a distinct dialect of Cahuilla. Villages were in areas with access to several resources, either at springs or where wells could be easily dug. As a result, most villages relied on hand-excavated walk-in wells for water. These wells were dug to a depth of about 20 feet, to reach the water table. Villages were loose clusters of houses spread over an area up to 0.6 miles across. Some houses were large, and others were smaller; at least one large ceremonial structure was present in each village. Once established, villages were considered permanent and were occupied by lineages. Villages were connected to each other by a complex system of trails. The Cahuilla were organized into moieties, tribelets (i.e., clans), and

then lineages. See **Section 4.4, *Cultural Resources,*** for a full discussion of the ethnohistoric context of the City.

4.14.4 Regulatory Setting

See **Section 4.4, *Cultural Resources,*** for a full discussion of the federal and State regulations related to Tribal cultural resources.

State

California Assembly Bill 52 (AB 52)

In addition to Native American Consultation that occurs as part of the Cultural Resource Assessment, AB 52, which went into effect on July 1, 2015 requires a lead agency to consider a project's impacts on Tribal Cultural Resources ("TCR"). TCR as defined in Public Resources Code § 21074 are as follows:

(a) "Tribal cultural resources" are either of the following:
  (1) Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American Tribe that are either of the following:
    (A) Included or determined to be eligible for inclusion in the California Register of Historical Resources.
    (B) Included in a local register of historical resources as defined in subdivision (k) of Section 5020.1.
  (2) 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 of Section 5024.1. In applying the criteria set forth in subdivision (c) of Section 5024.1 for the purposes of this paragraph, the lead agency shall consider the significance of the resource to a California Native American Tribe.

(b) A cultural landscape that meets the criteria of subdivision (a) is a Tribal cultural resource to the extent that the landscape is geographically defined in terms of the size and scope of the landscape.

(c) A historical resource described in Section 21084.1, a unique archaeological resource as defined in subdivision (g) of Section 21083.2, or a "nonunique archaeological resource" as defined in subdivision (h) of Section 21083.2 may also be a Tribal cultural resource if it conforms with the criteria of subdivision (a).

Section 1 (a)(9) of AB 52 establishes that "a substantial adverse change to a Tribal cultural resource has a significant effect on the environment." Effects on Tribal cultural resources should be considered under CEQA. Section 6 of AB 52 adds Section 21080.3.2 to the PRC, which states that parties may propose mitigation measures "capable of avoiding or substantially lessening potential significant impacts to a Tribal cultural resource or alternatives that would avoid significant impacts to a Tribal cultural resource."

Further, if a California Native American Tribe requests consultation regarding project alternatives, mitigation measures, or significant effects to Tribal cultural resources, the consultation shall include those topics (PRC Section 21080.3.2[a]). The environmental document and the mitigation monitoring and reporting program (where applicable) shall include any mitigation measures that are adopted (PRC Section 21082.3[a]).

Under AB 52, the CEQA Lead Agency is required to begin consultation with a California Native American Tribe that is traditionally and culturally affiliated with the geographic area of the proposed project. "Consultation" is the meaningful and timely process of seeking, discussing, and considering carefully the views of others, in a manner that is cognizant of all parties' cultural values and, where feasible, seeking agreement. Consultation concludes when either: the parties agree on measures to mitigate or avoid significant impacts to TCRs; or a party, in good faith and after reasonable effort, concludes that a mutual agreement cannot be reached.

4.14.5 Project Impact Analysis

Thresholds of Significance

The thresholds analyzed in this section are derived from Appendix G of the CEQA Guidelines and are used to determine the level of potential effect. The significance determination is based on the recommended criteria set forth in Section 15064.5 of the CEQA Guidelines. For analysis purposes, development of the proposed project would have a significant effect on Tribal cultural resources if it is determined that the project will:

a. Cause a substantial adverse change in 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 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.

Methodology, Native American Participation

On September 20, 2022, SRI submitted a written request to the NAHC for a records search in the commission's Sacred Lands File. In response to SRI's inquiry, the NAHC recommended that local Native

American groups be contacted for further information. For that purpose, the NAHC provided a list of 21 Tribal organizations listed below who were contacted:

- Reid Milanovich, Agua Caliente Band of Cahuilla Indians
- Patricia Garcia-Plotkin, Agua Caliente Band of Cahuilla Indians
- Amanda Vance, Augustine Band of Cahuilla Mission Indians
- Doug Welmas, Cabazon Band of Mission Indians
- Daniel Salgado, Cahuilla Band of Indians
- Raymond Chapparosa, Los Coyotes Band of Cahuilla and Cupeno Indians
- Robert Martin, Morongo Band of Mission Indians
- Ann Brierty, Morongo Band of Mission Indians
- Jill McCormick, Quechan Tribe of the Fort Yuma Reservation
- Manfred Scott, Quechan Tribe of the Fort Yuma Reservation
- Joseph Hamilton, Ramona Band of Cahuilla Indians
- John Gomez, Ramona Band of Cahuilla Indians
- Jessica Mauck, San Manuel Band of Mission Indians
- Lovina Redner, Santa Rosa Band of Cahuilla Indians
- Mark Cochrane, Serrano Nation of Mission Indians
- Wayne Walker, Serrano Nation of Mission Indians
- Joseph Ontiveros, Soboba Band of Luiseño Indians
- Isiah Vivanco, Soboba Band of Luiseño Indians
- Cultural Committee, Torres-Martinez Desert Cahuilla Indians
- Anthony Madrigal, Twenty-Nine Palms Band of Mission Indians
- Darrell Mike, Twenty-Nine Palms Band of Mission Indians

The Quechan Tribe of Fort Yuma Reservation responded and had no comments regarding the project. The San Manuel Band of Mission Indians indicated that they would defer to local Tribes. The Augustine Band of Cahuilla Indians responded that they have no specific archival information on the project area that would indicate sacred/religious or other Native American cultural importance. The Los Coyotes Band of Cahuilla and Cupeño Indians, the Santa Rosa Band of Cahuilla Indians, and the Soboba Band of Luiseño Indians stated that their lack of response meant that they did not wish to comment and requested that comments be deferred to the Agua Caliente Band of Cahuilla Indians (ACBCI). Lacy Padilla, of the Tribal Historic Preservation Office (THPO) for the ACBCI, responded that although the project area is not within the boundaries of the ACBCI Reservation, it is within the Tribe's traditional use area and requested copies of studies and records, and the presence of a Tribal monitor during earth moving activities.

City of Palm Springs Tribal Consultation under AB 52

The City of Palm Springs initiated Tribal consultation, as required by AB 52. The consultation period started on May 24, 2023, and ended on June 24, 2023. The City sent letters to six local Tribal

representatives that have requested consultation on new development projects. The Agua Caliente Band of Cahuilla Indians, Morongo Band of Mission Indians and the Twenty-Nine Palms Band of Mission Indians responded in writing. The Agua Caliente stated that while the site is not within the ACBCI boundaries, it is within their Traditional Use Area and requested consultation (**Appendix E**). The Twenty-Nine Palms Band and Morongo Band of Mission Indians deferred to Tribes more closely associated with the land. The City did not receive any additional requests for consultation.

Following consultation with ACBCI, the Tribe provided the City with a letter indicating that they requested site records and conditions of approval for the project and concluded consultation. See **Appendix E**.

Project Impacts

a.i.-ii. Would the project cause a substantial adverse change in the significance of a Tribal cultural resource that is listed or eligible for listing in the California Register of Historical Resources, or in a local Register of historical resources as defined in Public Resource Code Section 5020.1(k); or a significant Tribal cultural resource pursuant to criteria set forth in subdivision (c) of Public Resource Code Section 5024.1?

Public Resource Code 21074 identifies "Tribal Cultural Resources" as "sites, features, places, cultural landscapes, sacred places, and objects with culture value to California Native American Tribe" and that are either included or determined to be eligible for inclusion on the national, State, or local register of historic resources or that are determined by the lead agency, in its discretion, to be significant when taking into consideration the significance of the resource to a California Native American Tribe.

During the field survey, two archaeological isolates were recorded west of the project site.

The Sacred Lands File search by the NAHC produced negative results for Native American cultural resources in the general vicinity. However, because of the prehistoric ceramic sherds found in the project area and the isolated prehistoric artifacts previously documented in the records search area, the project area may be sensitive for buried archaeological resources. The ACBCI has requested that a cultural resource monitor from the Tribe and an archaeologist that meets the Secretary of Interior's standards be present during ground-disturbing activities related to the project. **Mitigation Measure CUL-1** requires that archaeological monitoring be implemented to ensure that any unanticipated discoveries made during project-related ground disturbance activities are properly treated. A qualified archaeologist and a Tribal monitor shall be present during ground disturbing activities. This measure is acceptable to the ACBCI and would reduce their concerns regarding the project's impacts to Tribal resources to less than significant levels. Additionally, the ACBCI requested that an archaeological monitoring plan be developed in consultation with the Tribe. This is required by **Mitigation Measure CUL-1.** With implementation of

MM CUL-1 the ACBCI concluded the AB52 consultation efforts in their written letter dated December 1, 2023 (**Appendix E**)**.** Therefore, **i**mpacts to Tribal cultural resources would be less than significant.

Off-Site Improvements

The project will connect to existing 12-inch sewer lines approximately 650 feet east of the project, along 19th Avenue. The project will extend these lines to provide sewer to the property. Sewer improvements will occur within the existing right-of-way, which has already been disturbed (trenched and paved) to accommodate 19th Avenue access. These improvements will be monitored as will the project site, to assure that impacts to tribal resources remain less than significant.

4.14.6 Cumulative Impacts

Build out of the General Plan area, including lands of the proposed project, has the potential to cumulatively impact Tribal cultural resources. Development of other projects within the City and surrounding area would also be subject to CEQA review and the same standard requirements, mitigation measures (as applicable), and compliance with federal and State law as the proposed project. Although continued development has the potential to cumulatively impact these resources, the continued application of City policies, General Plan policies and programs, federal and State law all will assure that cumulative impacts associated with Tribal cultural resources will be less than significant.

4.14.7 Mitigation Measures

CUL-1 Prior to ground disturbance (including clearing, grubbing, etc.) the applicant/developer will retain a qualified archaeological monitor and an ACBCI Tribal monitor to be present during all ground disturbing activities. If cultural materials are discovered during grading or excavation, the construction contractor shall cease all earthmoving activity within and around the immediate discovery area until a qualified archaeologist can assess the nature and significance of the find. An archaeological monitoring plan will be developed and implemented to ensure that any unanticipated discoveries made during project-related ground-disturbing activities are properly treated. The archaeologist, in consultation with ACBCI, shall be consulted to reduce or terminate monitoring when it is indicated by field conditions and as appropriate.

4.14.7 Level of Significance After Mitigation

Mitigation Measure CUL-1 would reduce potential impacts to Tribal cultural resources to a less than significant level. No significant and unavoidable impacts to archaeological resources would occur with implementation of this mitigation measure. After mitigation has been implemented, all anticipated impacts to Tribal cultural resources would be considered less than significant.

4.14.8 Resources

1. City of Palm Springs 2007 General Plan, Chapter 5 Recreation, Open Space & Conservation Element.
2. Cultural Resources Assessment of the Proposed Indian Canyon Warehouse and Distribution Center, Statistical Research, Inc., February 2023.

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4.15 Utilities and Service Systems

4.15.1 Introduction

This section addresses the existing utilities and service systems for the proposed project. This section also addresses the potential for the proposed project to impact the water supply, wastewater demand, solid waste, electricity, natural gas, and telecommunication facilities of the project site and surroundings, and identifies and analyzes environmental impacts of the project's demand on these facilities. This section is based on the information contained in *2020 MSWD Regional Urban Water Management Plan*, *The PS Fulfillment Center Water Supply Assessment, the PS Fulfillment Center Preliminary Hydrology Report* (**Appendix H** and **M***), Chapter 4, Circulation Element*, and *Chapter 5, Recreation. Open Space & Conservation Element,* from the Palm Springs General Plan. Sources used in the preparation of this section are identified in **Chapter 8.0, *References*,** at the end of this Draft EIR.

4.15.2 Existing Conditions

Domestic Water Service

Misson Springs Water District (MSWD) is the public water supplier in this area of Palm Springs. MSWD was established in 1953 and was formerly known as Desert Hot Springs County Water District. The District's water service area consists of 135 square miles including the City of Desert Hot Springs, 10 smaller communities in Riverside County, and in the northern portion of the City of Palm Springs. The District's water supply source is 100 percent groundwater produced from District-owned and operated wells. The District provides water service to approximately 43,000 people in its water service area.

MSWD's water supply and distribution system includes three separate and distinct water supply and distribution systems with the largest of the three systems serving the community of Desert Hot Springs; the surrounding communities of West Garnet (located south of Interstate 10 and West of Indian Avenue); and North Palm Springs. The two smaller systems, Palm Springs Crest System and West Palm Springs Village System, are located approximately five miles west of Desert Hot Springs. These two communities are located on the north side of Interstate 10 (I-10) abutting the Morongo Indian Reservation.

MSWD currently receives 100 percent of its water supply from groundwater produced from subbasins within the Coachella Valley Groundwater Basin, which underlies the District's water service area. MSWD primarily produces groundwater from the Mission Creek Subbasin via eight active wells. To a lesser extent, the District also produces groundwater from the Indio Subbasin (including the Garnet Hill Subarea) via three active wells; and the San Gorgonio Pass Subbasin via two active wells.

Stormwater System

The project is located in the Whitewater River Watershed, which is an arid desert region encompassing approximately 1,645 square miles.

The Whitewater River Region is drained primarily by the Whitewater River that flows to the Coachella Valley Stormwater Channel (CVSC) and outlets to the Salton Sea. Ephemeral tributary drainage to the Whitewater River from the northern area of Palm Springs and portions of Desert Hot Springs include Garnet Wash, Mission Creek, and Little Morongo Creek-Morongo Wash. These drainage courses generally follow a south and southeastern direction and confluence with Whitewater River. In this local context, the project site is located between the tributary areas associated with Garnet Wash to the west, and Mission Creek to the east.

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

The physical ground conditions on the project site primarily consist of undeveloped and relatively level terrain, with sparse vegetation coverage on visibly uniform sandy soils intermixed with small to medium-sized boulders. The site elevation has a gentle gradient from north to south, descending from approximately 792 feet at the north edge to approximately 770 feet at the south edge, along a run of approximately 1,305 feet. This gradient condition is equivalent to a slope of approximately 1.68 percent across the site from north to south. The vacant site is absent of any formal structures or storm drainage improvements. See **Section 4.9, *Hydrology and Water Quality***, of this Draft EIR for an in-depth discussion of existing flood control conditions, both locally and at the project site.

Wastewater Service System

Mission Springs Water District (MSWD) is responsible for providing wastewater service to this area of Palm Springs. MSWD has a network of approximately 45 miles of sewer. MSWD operates two wastewater treatment plants. The Horton Wastewater Treatment Plant (Horton WWTP), located on Verbena Drive about a half mile south of Two Bunch Palms Trail, has a capacity of 2.3 million gallons per day (MGD). The average daily flow metered to the plant in 2020 was 2.0 MGD. The Desert Crest Wastewater Treatment Plant, located about a half mile southeast of the intersection of Dillion Road and

Long Canyon Road, has a capacity of 0.18 MGD and serves a country club development and mobile home park. The average daily flow to the plant in 2020 was metered at 0.05 MGD.

Both District wastewater treatment plants use an extended aeration process for treatment and dispose of the secondary wastewater, which is not disinfected, in adjacent percolation/evaporation ponds located within the plant on the southwest (potable water) side of the Mission Creek Fault. In addition, effluent is used for irrigation and maintenance at the treatment plants. MSWD does not currently have a recycled wastewater program. Currently, the project is not served by a wastewater system due to its undeveloped condition.

Solid Waste

Riverside County Department of Waste Resources (RCDWR) is responsible for the landfilling of non-hazardous county waste. In this effort the Department operates five landfills, has a contract agreement for waste disposal with an additional private landfill and administers several transfer station leases. The RCDWR Planning Section ensures that the County's planned and proposed waste management activities and projects are in compliance with applicable federal, state and local land use and environmental laws, regulations, and ordinances.

As part of its long-range planning and management activities, the RCDWR ensures that Riverside County has a minimum of 15 years of capacity, at any time, for future landfill disposal. The 15-year projection of disposal capacity is prepared each year as part of the annual reporting requirements for the Countywide Integrated Waste Management Plan.

Solid waste disposal and recycling services for the City of Palm Springs are provided by Palm Springs Disposal. This service provider offers its customers a wide range of services for residential and commercial businesses, construction-related activities and special events. Solid waste and recycling collected from the proposed project will be hauled to the Edom Hill Transfer Station. This transfer station is permitted to receive 3,500 tons per day (tpd). Residual waste from this transfer station is then sent to a permitted landfill or recycling facility outside of the Coachella Valley. The following **Table 4.15-1, *Riverside County Landfills,*** outlines the estimated closure dates and capacities of landfills that serve the City and could serve the proposed project.

Table 4.15-1 Riverside County Landfills

Landfill Sites	Estimated Closure Year	Permitted Capacity (tons/day)	Maximum Permitted Capacity (cubic yards)	Remaining Capacity (cubic yards)
Badlands	2059	5,000	82,300,000	7,800,000
Lambs Canyon	2032	5,000	39,681,513	19,242,950
Blythe	2052	400	6,003,343	3,271,203
Desert Center	2107	60	409,112	127,414
El Sobrante	2051	16,054	209, 910,000	143,977,170
Oasis	2055	400	1,09,152	433,779
Source: CalRecycle 2023				

Currently, the project does not generate solid waste due to its vacant and undeveloped condition.

Electricity

In Palm Springs, electric power service is provided by Southern California Edison (SCE). SCE is one of the nation's largest electric utilities, providing electricity service to more than 15 million people in a 50,000 square-mile area of central, coastal and Southern California. According to the CEC Energy Consumption Database, approximately 104,406 GWh was consumed in SCE's service area in 2018.

Desert Community Energy (DCE), launched in April 2020, is the public electricity provider for the City of Palm Springs. DCE is a community based and locally controlled electricity provider serving the City. As part of the city's commitment to sustainability, Palm Springs has chosen 100% Carbon Free power as the default option for their community. Carbon Free power sources include renewable sources such as solar, wind, and geothermal in addition to large hydroelectric.

The project site is not currently served by electricity, due to its vacant and undeveloped condition.

Natural Gas

Natural gas is provided to the City of Palm Springs, by the Southern California Gas Company (SoCalGas). SoCalGas is the principal distributor of natural gas in Southern California, serving residential, commercial, and industrial markets. SoCalGas has 21.4 million customers in more than 500 communities encompassing approximately 20,000 square miles throughout Central and Southern California.

Currently, natural gas is not provided to the site and will not be used for this project.

Telecommunications

As telephone service has become less regulated and technology has improved, a number of communication alternatives have become available to the public, including cellular, internet, fiber optic, and cable-based services. As the City of Palm Springs continues to develop, it is expected that a number of new technologies will become available to assure adequate and effective communication and data transfer for the City's residents and businesses.

The project property is not currently served by telecommunication facilities, but the project is located within the service area of Spectrum and Frontier Communications.

4.15.3 Regulatory Setting

Federal

Clean Water Act and Safe Drinking Water Act

The Clean Water Act (CWA) was established in 1972 as the basic structure for regulating discharges of pollutants into the waters of the United States and regulating quality standards for surface waters. Under the CWA, the Environmental Protection Agency (EPA) has implemented pollution control programs such as setting wastewater standards for industries. The EPA has also developed national water quality criteria recommendations for pollutants in surface waters.

It is unlawful under the CWA to discharge any pollutant from a point source, which is a discrete conveyance such as pipes or man-made ditches, into navigable waters unless a permit is obtained. The National Pollutant Discharge Elimination System (NPDES) permit program controls discharges. Industrial, municipal, and other facilities must obtain permits if their discharges go directly to surface waters. Compliance monitoring under the NPDES Program encompasses a range of techniques in order to address the most significant problems and to promote compliance among the regulated community.

The Safe Drinking Water Act (SDWA) was originally passed by Congress in 1974 to protect public health by regulating the nation's public drinking water supply. SDWA authorizes the EPA to set national health-based standards for drinking water to protect against both naturally-occurring and man-made contaminants that may be found in drinking water. The U.S. EPA, states, and water systems then work together to make sure that these standards are met (EPA 2020).

National Flood Insurance Program

The Federal Emergency Management Agency (FEMA) Flood Insurance Rate Maps (FIRMs) serve as the basis for identifying potential hazards and determining the need for and availability of federal flood insurance. As mandated by the National Flood Insurance Act of 1968 and the Flood Disaster Protection Act of 1973, FEMA administers the National Flood Insurance Program (NFIP) to provide subsidized federal flood insurance to residents of communities where future floodplain development is regulated. FEMA has developed FIRMS to determine the need for and availability of federal flood insurance. FIRM maps rely on a variety of flood risk information based on historic, meteorological, hydrologic and hydraulic data, as well as existing development, open space and topographic conditions within an area. FEMA mapping also incorporates the results of engineering studies to delineate Special Flood Hazard Areas (SFHAs), which are considered at higher risk of inundation and flood-related hazards.

Resource Conservation and Recovery Act (RCRA)

This law was enacted in 1976 and is the principal federal law governing the disposal of solid waste and hazardous waste. The U.S. Environmental Protection Agency (U.S. EPA) oversees waste management regulation pursuant to Title 40 of the Code of Federal Regulations. Under RCRA, however, states are authorized to carry out many of the functions of the federal law through their own hazardous waste programs and laws, as long as they are at least as stringent (or more so) than the federal regulations. Thus, CalRecycle manages the State of California's solid waste and hazardous materials programs pursuant to U.S. EPA approval.

State

California Water Code

Requirements for the preparation of a Water Supply Assessment (WSA) are set forth in Senate Bill 610 (SB 610), which was enacted in 2001 and became effective January 1, 2002. SB 610 amended Section 21151.9 of the Public Resources Code. It requires cities and counties and other CEQA lead agencies to request specific information on water supplies from the Public Water System (PWS) that would serve any project that is subject to CEQA and is defined as a "Project" in Water Code Section 10912. This information is to be incorporated into the environmental review documents prepared pursuant to CEQA.

The Water Code requires a WSA be prepared for any project that consists of one or more of the following:

- A proposed residential development of more than 500 dwelling units
- A proposed shopping center or business establishment employing more than 1,000 persons or having more than 500,000 square feet of floor space
- A proposed commercial office building employing more than 1,000 persons or having more than 250,000 square feet of floor space
- A proposed hotel or motel, or both, having more than 500 rooms
- A proposed industrial, manufacturing, or processing plant, or industrial park planned to house more than 1,000 persons, occupying more than 40 acres of land, or having more than 650,000 square feet of floor area
- A mixed-use project that includes one or more of the projects specified above
- A project that would demand an amount of water equivalent to, or greater than, the amount of water required by a 500-dwelling unit project
- For public water systems with fewer than 5,000 service connections, a project that meets the following criteria: any proposed residential, business, commercial, hotel or motel, or industrial development that would account for an increase of 10 percent or more in the number of the public water system's existing service connections, or a mixed-use project that would demand an amount of water equivalent to, or greater than, the amount of water required by residential

development that would represent an increase of 10 percent or more in the number of the public water system's existing service connections.

California Water Boards

The California Water Board consists of the State Water Resources Control Board and the Regional Water Quality Control Board. Together they work to preserve, protect, enhance, and restore water quality. The State Water Board sets statewide water quality standards, issues statewide general permits, conducts statewide surface and groundwater monitoring and assessment, and issues orders for cleaning up contaminated sites. The State and Regional Water Boards also work with federal, State, and local agencies, as well as other environmental agencies to ensure a coordinated approach to protecting human health and the environment.

There are nine regional water quality control boards statewide. The nine Regional Boards are semi-autonomous and are comprised of seven part-time Board members appointed by the Governor and confirmed by the Senate. Regional boundaries are based on watersheds and water quality requirements are based on the unique differences in climate, topography, geology, and hydrology for each watershed. Each Regional Board makes critical water quality decisions for its region, including setting standards, issuing waste discharge requirements, determining compliance with those requirements, and taking appropriate enforcement actions. The project site is located in the Colorado River Basin Region (Region 7).

Urban Water Management Planning Act

In 1983, the Urban Water Management Planning Act (UWMPA) was established by Assembly Bill 797, and passage of this law recognized that water is a limited resource and that efficient water use and conservation would be actively pursued throughout the State of California. The UWMPA requires that water suppliers providing water for municipal purposes either directly or indirectly to more than 3,000 customers, or supplying more than 3,000 acre-feet of water annually, prepare and submit an Urban Water Management Plan (UWMP) to the California Department of Water Resources (DWR) every five years.

UWMPs are considered to be foundation documents and a source of information for Water Supply Assessments and Written Verifications of Water Supply. In addition, an UWMP may serve as a long-range planning document for water supply, a source of data for development of a regional water plan, and a source document for cities and counties as they prepare their General Plans. These planning documents are linked, and their accuracy and usefulness are interdependent. One of the primary objectives of the UWMP is the assessment of demands and supplies over a 20-year or a 25-year planning horizon under normal rainfall conditions as well as under various drought conditions.

CalRecycle

CalRecycle is the term the State of California uses for its Department of Resources Recycling and Recovery, formerly known as the California Integrated Waste Management Board (CIWMB). This state agency performs a variety of regulatory functions pursuant to California Code of Regulations (CCR) Title 27 and other regulations. Among other things, CalRecycle set minimum standards for the handling and disposal of solid waste designed to protect public health and safety, as well as the environment. It is also the lead agency for implementing the State of California municipal solid waste program deemed adequate by the U.S. EPA for compliance with RCRA.

California Integrated Waste Management Act (IWMA) (Assembly Bill (AB) 939)

This act was passed by the State Legislature in 1989 to reduce dependence on landfills for the disposal of solid waste and to ensure an effective and coordinated system for the safe management of all solid waste generated within California. With its passage, solid waste management practices were redefined to require California cities and counties to divert disposal of solid waste by 50% by the year 2000. It also required local governments to prepare and implement plans to improve waste resource management by integrating management principles that place importance on first reducing solid waste through source reduction, reuse, recycling and composting before disposal at environmentally safe landfills or via transformation (e.g., regulated incineration of solid waste materials). These plans must also be updated every five years (Riv. County EIR No. 521).

Mandatory Diversion and Recycling, AB 341

Approved in 2011, this act amended the California Public Resources Code (Section 42649 et seq.) to address solid waste diversion (i.e., recycling) targets to decrease the amount of waste going to landfills and thus extend their usable lives. AB 341 requires cities and counties, including Riverside County, to include source reduction, recycling and composting in their integrated waste management plans (IWMP). In addition, under AB 341 counties were required to "divert 50% of all solid waste from landfill disposal or transformation [e.g., incineration] by January 1, 2000, through source reduction, recycling and composting activities." By 2020, the target rose to "not less than 75% of solid waste." (Riv. County EIR No. 521).

California's Energy Efficiency Standards for Residential and Nonresidential Buildings

Located in CCR Title 24, Part 6 and commonly referred to as "Title 24", these energy efficiency standards were established in 1978 in response to a legislative mandate to reduce California's energy consumption. The goal of Title 24 energy standards is the reduction of energy use. The standards are updated periodically to allow consideration and possible incorporation of new energy efficiency technologies and methods. In December 2019, the California Energy Commission (CEC) adopted the 2022 Building and Energy Efficiency Standards effective January 1, 2023. Title 24 of the California Administrative Code sets

efficiency standards for new construction, regulating energy consumed for heating, cooling, ventilation, water heating, and lighting. These building efficiency standards are enforced through the City's building permit process.

Title 24 also includes Part 11, known as California's Green Building Standards (CALGreen). The CALGreen standard took effect in January 2011 and instituted mandatory minimum environmental performance standards for all ground-up new construction of commercial, low-rise residential, and State-owned buildings, as well as schools and hospitals. The 2022 CALGreen standards became effective on January 1, 2023. Part 11 establishes design and development methods that include environmentally responsible site selection, building design, building siting and development.

Regional and Local

Regional Urban Water Management Planning

MSWD has participated in the Coachella Valley Regional Urban Water Management Plan (RUWMP) for its reporting requirements for 2020. The California Water Code (CWC) requires urban water suppliers to have a current UWMP on file with DWR in order for the urban water suppliers to be eligible for any water management grant or loan administered by DWR. In addition, the UWMP Act requires a retail water agency to meet its 2020 Compliance Urban Water Use Target and report compliance in the 2020 UWMP.

The MSWD RUWMP analyzes the potential sources of water supply and their probable yields; the probable urban water demand, given reasonable assumptions; the comparability of the supply and demand figures; and the water supplies under a range of hydrologic conditions. These are addressed in the RUWMP by the identification of feasible and cost-effective opportunities to meet existing and future demands. The RUWMP also analyzed water supply during normal year, single-dry year, and multiple-dry year conditions to ensure supply would appropriately meet regional demand.

Integrated Regional Water Management Plan

Established in 2002, the Integrated Regional Water Management Planning (IRWMP) encourages local entities to collaboratively establish regional water management groups to improve water quality and water supply reliability to meet the State of California's overall water needs. In 2008, the Coachella Valley Regional Water Management Group (CVRWMG) was formed as a collaborative effort led by five water purveyors and one wastewater agency, (Mission Springs Water District, Coachella Valley Water District, Coachella Water Authority, Desert Water Agency, Indio Water Authority, and Valley Sanitary District), to develop and implement an Integrated Regional Water Management (IRWM) Plan to address the water resources planning needs of the Coachella Valley.

Mission Springs Water Efficient Landscaping Guidelines

MSWD implements water conservation guidelines to reduce the per capita quantity of water use under their jurisdiction. These guidelines promote the general welfare by requiring the reasonable and efficient use the District's water resources and preventing the waste or unreasonable use of water, and by implementing water conservation measures that will reduce water consumption within the District's service area.

Countywide Integrated Waste Management Plan

The Countywide Integrated Waste Management Plan (CIWMP) was prepared in accordance with the California Integrated Waste Management Act of 1989, Chapter 1095 (AB 939), and is updated every five years. The CIWMP outlines and codifies the goals, policies and programs that the County of Riverside and its cities are implementing to create an integrated and cost-effective waste management system that complies with the provisions of AB 939 and its diversion mandates. The CIWMP's components include the Countywide Summary Plan, the Countywide Siting Element, the Source Reduction and Recycling Element, the Household Hazardous Waste Element and Non-Disposal Facility Element. Each of these Elements address plans for Riverside County and each of its cities. The Riverside Countywide Integrated Waste Management Plan was approved by the California Integrated Waste Management Board in September of 1996 and has subsequently been updated at five-year intervals as required by law.

4.15.4 Project Impact Analysis

Thresholds of Significance

The following standards and criteria for establishing significance of potential impacts related to utilities and service system were derived from the CEQA Guidelines, Appendix G. Development of the proposed project would have a significant impact related to utilities and service systems if the project would:

a. Require or result in the relocation or construction of new or expanded water, or 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 insufficient 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 inadequate 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. Fail to comply with federal, State, and local management and reduction statutes and regulations related to solid waste?

Methodology

The potential for project-specific and cumulative impacts associated with utilities and related service systems was assessed based upon available data that considers the project, the project site, related projects and General Plan build out. Impacts on water demand, wastewater, solid waste, energy, and telecommunication facilities that would result from the project were identified by determining the future demand associated with project implementation. A quantitative comparison was used to determine impacts of the project on future demands.

The project-specific Water Supply Assessment/Water Supply Verification (WSA/WSV), and Preliminary Hydrology Report were consulted to determine water use, and proposed stormwater facilities. A brief summary of the reports are provided below.

Water Supply Assessment/Water Supply Verification

The WSA/WSV is intended to document the sufficiency of the local water supply to meet the demand of development that could occur under the proposed project. The domestic water supplies and associated landscape irrigation supplies will be provided from groundwater from the Mission Creek Subbasin in the Coachella Valley Groundwater Basin.

The WSA/WSV provides an assessment and verification of the availability of water supplies during normal, single-dry, and multiple-dry years over a 20-year projection to meet the projected demands of the project, in addition to existing and planned future water demands of MSWD, as required by Senate Bill 610 (SB 610), and SB 1262. The WSA/WSV also includes identification of existing water supply entitlements, water rights, water service contracts, or agreements relevant to the identified water supply for the project and quantities of water received in prior years pursuant to those entitlements, rights, contracts, and agreements. The WSA/WSV is provided in **Appendix M**.

Preliminary Hydrology Report

The project-specific Preliminary Hydrology Report was prepared in January 2023, and is provided in **Appendix J.1**. The purpose of the Preliminary Hydrology Report is to provide basin analyses for the subject property. The proposed stormwater management would introduce privately constructed and maintained on-site retention facilities, surface and underground, sized to accept and infiltrate the stormwater volume resulting from the controlling 100-year storm event for each project drainage area, as mandated by the City's Engineering Standards. Detailed information on hydrology is provided in **Section 4.9**.

Project Impact

a. Requires or results 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.

Water

Water to the proposed project will be provided by Mission Springs Water District via project constructed connections or laterals to existing lines located in 19th Avenue. The project proposes to connect to the existing 16-inch water main on 19th Avenue. A new private 8-inch water line will connect to the public 16-inch water main and provide water to development. A 12' fire line is also proposed for the projects fire hydrant and sprinkler system. The infrastructure and design components for the project will be consistent with MSWD requirements and the RUWMP. The project will be further reviewed by City and MSWD staff to ensure compliance with all current and applicable water requirements. No new off-site water facilities are required as a result of project development.

Wastewater

MSWD provides water and wastewater service throughout the northern portion of the Coachella Valley and is the provider of wastewater to the project site. Offsite improvements will include connecting the proposed project to the existing 12-inch sewer main located approximately 650 east of 19th Avenue. This connection would occur in the existing paved street of 19th Avenue . A new 8-inch private sewer main will be installed to connect to the off-site sewer main stub outs to serve the project site. Offsite improvements are expected to have less than significant impacts since 19th Avenue is an existing paved road disturbed by vehicle and pedestrian use.

Storm Water Drainage

There are no public storm water improvements in the area surrounding the project. As a standard requirement, the project site design will incorporate stormwater management by conveying site runoff into on-site retention basins with a combined capacity to handle the water quality management plan design capture volume and the controlling 100-year storm event volume.

The Preliminary Hydrology Report has calculated that the stormwater runoff volume resulting from the worst-case 100-year storm event for the project area in a developed condition would be approximately 297,329 cubic feet. As a result, the combined retention capacity provided by the project is sized at approximately 297,419 cubic feet. The retention capacity is distributed among a system of facilities, rather than a single location, in order to prevent concentrated flows and volumes, while facilitating the management effectiveness of these facilities after construction. The final volume and provided retention capacity will be subject to final review and approval by the City prior to project implementation. The retention of storm flows on-site results in a self-contained system, which protects surrounding streets from storm flows. Since there are no existing storm water facilities in the area, the on-site retention is

necessary, but no impact to City or regional storm water facilities will occur. As a standard requirement, the project is obligated to meet the City of Palm Spring's requirements by demonstrating that the incremental increase in runoff due to development can be adequately retained on-site. The project provides facilities to retain the entirety of the controlling 100-year, 24-hour storm event, therefore adequately meeting or exceeding the City of Palm Springs stormwater retention ordinance. As a result, the project will not result in off-site discharges of urban runoff within the design condition. Only runoff quantities resulting from a larger magnitude storm, such as a force majeure or natural disaster event beyond the City's engineering standards, would be allowed to be conveyed off-site.

Electric Power

The site is within the SCE service area for electric service. Existing overhead distribution power poles are located at the southwest corner of Indian Canyon Drive and 19th Avenue. The project will be required to connect to the existing off-site SCE electrical infrastructure to provide electricity to the site. Coordination with SCE will allow the project to extend electrical facilities along existing, disturbed right-of-way to serve the site, and to comply with all requirements of the utility provider during the project development.

Buildout of the project, related projects, and additional forecasted growth in SCE's service area would cumulatively increase the demand for electricity supplies and infrastructure capacity. SCE's planning area consumed approximately 103,045 GWh electricity in 2021. According to the CEC's Demand Analysis Office, SCE estimates that electricity consumption within SCE's planning area will be approximately 129,000 GWh (which is 129,000,000 MWh) annually by 2030. Based on the project's estimated annual electrical consumption of 3,673.072 MWh, the project would account for approximately 0.003 percent of SCE's total estimated demand in 2030. The closest energy facility to the project site is the Indigo Energy Facility located approximately 700 feet west of the project. The Indigo Energy Facility is a 136-megawatt (MW), natural gas, simple-cycle electric peak generating station. Additional substations in the project area include Garnet substation (0.60 miles south), Hugo Substation (0.65 miles southwest), and Devers Substation (2 miles northwest). SCE operates and maintains these facilities. SCE is constantly upgrading and expanding their electricity distribution networks to ensure capacity and reliability with the anticipated growth within their service area. In recent years, the Devers Substation received upgrades to equipment to achieve higher capacity.

A total of approximately 453,310 kWh of electricity is anticipated to be consumed during construction. The electricity demand at any given time would vary throughout the construction period based on construction activities being performed and would cease upon completion of construction. The estimated construction electricity usage represents approximately 12.3 percent of the project's estimated annual operational demand.

SCE implements energy conservation measures in the service area. The project will be required to comply with regional and local conservation measures to ensure project-related energy consumption is not

significant. Energy codes established by the State will be implemented by the project as an effort to reduce energy consumption and increase energy efficiency at the project site.

The City of Palm Springs, along with SCE, implements plans to reduce electricity consumption by taking part in the Desert Community Energy (DCE), which is the community-based, locally controlled electricity provider serving Palm Springs. THE DCE provides renewable power sources such as solar, wind, and geothermal in addition to large hydroelectric (which is considered carbon free but not renewable) to their service area. SCE has met or exceeded all Renewable Portfolio Standard requirements to date, procuring renewable energy from diverse renewable sources (listed above). This standard requires all California utilities to generate 33 percent of their electricity from renewables by 2020, 60 percent of their electricity from renewables by 2030, and 100 percent by 2045. SCE's Pathway 2045 program will achieve carbon neutrality by decarbonizing all sectors of the economy and will necessitate rigorous planning to keep energy safe, reliable, and affordable. Eighty gigawatts (GW) of new utility-scale clean generation and 30 GW of utility-scale energy storage will be required in the next 25 years.

Natural Gas

Natural gas will be provided to the project site by Southern California Gas Company through the extension of existing natural gas infrastructure located in the existing rights-of-way. At present there are 4-inch underground natural gas lines located approximately a half-mile west, in 19th Avenue.

In 2019, about 37 percent of natural gas delivered to consumers went to the state's industrial sector, and about 28 percent was delivered to the electric power sector. Natural gas fueled more than two-fifths of the state's utility-scale electricity generation in 2019. The residential sector, where two-thirds of California households use natural gas for home heating, accounted for 22 percent of natural gas deliveries. The commercial sector received 12 percent of the deliveries to end users and the transportation sector consumed the remaining 1 percent. The project's operational consumption of natural gas will include the use of exterior cargo handling equipment involving up to four (4) 200 horsepower (hp), natural gas-powered cargo handling equipment – port tractors conservatively operating at 4 hours a day for 365 days of the year. Project operational activity estimates and associated fuel consumption estimates are based on the annual EMFAC2021 offroad emissions for the 2025 operational year and were used to derive the total annual fuel consumption associated with on-site equipment. Project on-site equipment would consume an estimated 13,926 gallons of natural gas, which is equivalent to 1,273,560.6 kBTU and 1,236,466.6 cf of natural gas. Natural gas is not anticipated to be required during construction of the project.

Based on the 2018 California Gas Report, the California Energy and Electric Utilities estimates natural gas consumption within SoCalGas's planning area will be approximately 2,310 million cf per day in 2030. The project would consume approximately 0.15 percent of the 2030 forecasted consumption in SoCalGas's planning area.

Although the project would result in a long-term increase in demand for natural gas, the project would be designed to comply with Title 24, Part 6 of the California Code of Regulations (CCR) regarding energy consumption.

Telecommunications

The project is located within Frontier's and Charter Communications' service area for telecommunications. The project will tie into the existing cable, telecommunications lines located along Indian Canyon Drive. The project will not require or result in the relocation or construction of new or expanded telecommunication facilities.

Conclusion

The project will not require or result in the relocation or construction of new or expanded off-site water, storm water drainage systems, natural gas, or telecommunication facilities since they are all located in the street adjacent to the project site. The offsite connection for wastewater will occur in 19th Avenue which is an existing roadway covered by asphalt and disturbed by vehicle use. Communication between the project and the service providers during the project's construction and connection to existing facilities will occur throughout project development. Impacts would be less than significant.

b. Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

Groundwater is the primary source of domestic water supply in the Coachella Valley. MSWD provides potable water to this portion of the City of Palm Springs. MSWD's Regional Urban Water Management Plan (2020) has been developed to assist the agency in reliably meeting current and future water demands in a cost-effective manner. The comprehensive Water Management Plan guides efforts to eliminate overdraft, prevent groundwater level decline, protect water quality, and prevent land subsidence. The RUWMP serves as a planning tool that documents actions in support of long-term water resources planning and ensures adequate water supplies are available to meet existing and future urban water demands.

Development of the project would result in an overall increase in water demand from the project site during operation. Water consumed by the project was analyzed in the project specific WSA/WSV (**Appendix M**). The analysis of water resources and water supply is based upon the understanding of projected water supplies as developed by MSWD and used for the WSA/WSV prepared and adopted for the project including estimates of available groundwater.

The subbasins of the Coachella Valley Groundwater Basin are the Indio, Mission Creek, San Gorgonio Pass, and Desert Hot Springs Subbasins. MSWD pumps water primarily from the Mission Creek subbasin.

The project's land use plan summary is provided in **Table 4.15-2, *Project Land Use Summary.***

Table 4.15-2 Project Land Use Summary

Specific Plan/Land Use Designation	Land Area (Acres)	Target Density (EDUs/Acre)	Estimated Dwelling Units (EDUs)	Non-Residential Building Area (ft^2)
Industrial Building Area	16.7	0.00	0	727,360
Access Roads/Hardscape/Parking	15.37	0.00	0	0
Landscape/Open Space/Retention Basins	4.15	0.00	0	0
Right of Way Dedication	3.32	0.00	0	0
Total	**39.54**		**0**	**727,360**
Source: Appendix M PS Fulfillment Center WSA/WSV				

Based upon this analysis, the estimated total domestic water demand for indoor and outdoor use is approximately 118.37 acre-feet per year (AFY), or 2.99 acre-feet per acre as shown in **Table 4.15-3 *Project Total Water Demand.***

Table 4.15-3 Projected Total Water Demand

Planning Area	Land Area (Acres)	Indoor Residential Demand (AFY)	Indoor Commercial and Industrial Demand (AFY)	Outdoor Irrigation Demand (AFY)	Outdoor Recreational Demand (AFY)	Total Water Demand (AFY)
Industrial Building Area	16.70	0.00	78.13	0.00	0.00	78.13
Access Roads/Hardscape/Parking	15.39	0.00	0.00	23.91	0.00	23.91
Landscape/Open Space/Retention Areas	4.38	0.00	0.00	11.57	0.00	11.57
Right of Way Dedication	3.07	0.00	0.00	4.77	0.00	4.77
Total	**39.54**	**0.00**	**78.13**	**40.24**	**0.00**	**118.37**
Source: Appendix M PS Fulfillment Center WSA/WSV						

The domestic water supply (potable) for the project will be groundwater from the Mission Creek Subbasin. Groundwater storage will be used in dry years to make up the difference between the demand and the supply. The Misson Creek Subbasin is estimated to have a storage capacity of approximately 2.6 million AF and is capable of meeting the water demands for normal and extended drought periods, as determined in MSWDs RUWMP.

Table 4.15-4 Groundwater Storage in the Coachella Valley Groundwater Basin

Subbasin/Subarea	Storage (AF) [1]
Indio Subbasin	
Palm Springs Subarea	4,600,000
Thousand Palms Subarea	1,800,000
Oasis Subarea	3,000,000
Garnet Hill Subarea	1,000,000
Thermal Subarea	19,400,000
Indio Subbasin Subtotal	**29,800,000**
Mission Creek Subbasin	2,600,000
San Gorgonio Subbasin	2,700,000
Desert Hot Springs Subbasin	4,100,000
Total	**39,200,000**

Source: DWR Bulletin 108 (1964)

[1] First 1,000 feet below ground surface. (DWR, 1964)

The following tables from the 2020 RUWMP provide the MSWD's projected water supplies and demands. Projected demands for water use in the MSWD service area are summarized in ***Table 4.15-5 MSWD Projected Demands for Water and 4.15-6 MSWD Projected Urban Water Supplies.***

Table 4.15-5: MSWD Projected Demands for Water

	Projected Water Use (AFY)				
Use Type	**2025**	**2030**	**2035**	**2040**	**2045**
Single Family	4,743	5,143	5,543	6,066	6,588
Multi-Family	1,316	1,427	1,538	1,683	1,828
Commercial	459	498	537	587	638
Industrial	298	323	348	381	413
Institutional /Governmental	179	194	209	229	249
Landscape	984	1,067	1,150	1,258	1,366
Other	1,017	1,102	1,188	1,300	1,412
Total	**8,996**	**9,754**	**10,513**	**11,504**	**12,494**

Note: "Other" represents non-revenue water, which includes losses.
Source: 2020 Coachella Valley Regional Urban Water Management Plan

Table 4.15-6 MSWD Projected Urban Water Supplies

Water Supply	Projected Water Supply (AFY)					
	Additional Detail on Water Supply	**2025**	**2030**	**2035**	**2040**	**2045**
Groundwater	All Subbasins	8,996	9,754	10,513	11,504	12,495
Recycled Water		0	1,210	2,200	3,600	5,000
Total		**8,996**	**10,964**	**12,713**	**15,104**	**17,495**

Source: 2020 Coachella Valley Regional Urban Water Management Plan

The following tables from the 2020 Regional UWMP provide MSWD's projected water supplies and demands in a normal year, single-dry year, and multiple-dry years.

During normal years, MSWD will be able to meet current and future urban water demand needs projected in the 2020 Regional UWMP as shown in **Table 4.15-7, *Normal Year Supply and Demand Comparison***.

Table 4.15-7 Normal Year Supply and Demand Comparison

	2025	2030	2035	2040	2045
Supply Totals (AFY)	8,996	10,874	12,713	15,104	17,495
Demand Totals (AFY)	8,996	10,874	12,713	15,104	17,495
Difference	**0**	**0**	**0**	**0**	**0**

Source: 2020 Regional Urban Water Management Plan
Note: MSWD and the other Regional UWMP agencies collaborate on groundwater management plans for long-term sustainability. During a normal year, single-dry year, or five-dry year period, the agencies could produce additional groundwater if demands exceeded the estimates shown here.

During single-dry years, MSWD will be able to meet current and future urban water demand needs as shown in **Table 4.15-8.** Water supplies during the single-dry year are 100 percent reliable. CVWD's groundwater replenishment program replenishes the basin to increase groundwater storage during wet years and that supply is available for use during dry years which benefits all water districts using ground water, including MSWD. Thus, the supply and demand comparison for the single-dry year is the same as the normal year.

Table 4.15-8 Single-Dry Year Supply and Demand Comparison

	2025	2030	2035	2040	2045
Supply Totals (AFY)	8,996	10,874	12,713	15,104	17,495
Demand Totals (AFY)	8,996	10,874	12,713	15,104	17,495
Difference	**0**	**0**	**0**	**0**	**0**

Source: 2020 Regional Urban Water Management Plan
Note: MSWD and the other Regional UWMP agencies collaborate on groundwater management plans for long-term sustainability. During a normal year, single-dry year, or five-dry year period, the agencies could produce additional groundwater if demands exceeded the estimates shown here.

During multiple-dry years, MSWD will be able to meet current and future urban water demand needs through groundwater pumping as shown in **Table 4.15-9**. Similar to the single-dry year, the multiple-dry year water supply reliability is 100 percent. Thus, the supply and demand comparison for the multiple-dry years is the same as the normal year. MSWD and the other Regional UWMP agencies collaborate on groundwater management plans for long-term sustainability. During a normal year, single-dry year, or five-dry year period, the agencies could produce additional groundwater if demands exceeded the estimates shown here.

Table 4.15-9: Multiple-Dry Years Supply and Demand Comparison

		2025	2030	2035	2040	2045
First Year	**Supply Totals (AFY)**	8,996	10,874	12,713	15,104	17,495
	Demand Totals (AFY)	8996	10,874	12,713	15,104	17,495
	Difference	**0**	**0**	**0**	**0**	**0**
Second Year	**Supply Totals (AFY)**	8,996	10,874	12,713	15,104	17,495
	Demand Totals (AFY)	8,996	10,874	12,713	15,104	17,495
	Difference	**0**	**0**	**0**	**0**	**0**
Third Year	**Supply Totals (AFY)**	8,996	10,874	12,713	15,104	17,495
	Demand Totals (AFY)	8,996	10,874	12,713	15,104	17,495
	Difference	**0**	**0**	**0**	**0**	**0**
Fourth Year	**Supply Totals (AFY)**	8,996	10,874	12,713	15,104	17,495
	Demand Totals (AFY)	8,996	10,874	12,713	15,104	17,495
	Difference	**0**	**0**	**0**	**0**	**0**
Fifth Year	**Supply Totals (AFY)**	8,996	10,874	12,713	15,104	17,495
	Demand Totals (AFY)	8,996	10,874	12,713	15,104	17,495
	Difference	**0**	**0**	**0**	**0**	**0**

Source: 2020 Regional Urban Water Management Plan
Note: MSWD and the other Regional UWMP agencies collaborate on groundwater management plans for long-term sustainability. During a normal year, single-dry year, or five-dry year period, the agencies could produce additional groundwater if demands exceeded the estimates shown here.

MSWD's ability to meet demands during the type of year scenarios described above is determined by an analysis of the available water supplies within MSWD's water service area in each scenario. Considering the groundwater basin management efforts presented throughout the RUWMP, the historical groundwater supply availability during these scenarios is assumed to be fully reliable and an accurate assumption for future reliability.

Based on the analysis in the WSA, the project's total water demand will be 118.37 acre-feet per year (AFY). MSWD's long-term water management planning ensures that adequate water supplies are available to meet existing and future water needs within its service area by assessing the reliability of water sources over a 20-year planning horizon every 5-years through their UWMP. As shown in **Table 4.15-6, *MSWD Projected Urban Water Supplies***, MSWD's current urban water demand was 8,269 acre-feet (AF) for 2020, and the projected urban water demand by 2025 is 8,996 and by 2045 is 17,494 AFY. This Project's water demand of 118.37 AFY accounts for approximately 1.32 percent of the total planned increase in demand of 8,996 AFY by 2025 and 0.68 percent of the total planned increases in demand of 17,494 AFY by 2045.

Based on the information, analysis, and findings documented in the WSA for the project, MSWD has sufficient water supplies to meet the demands of the project, as well as future demands of the project plus all forecasted demands in the next 20 years. MSWD currently receives 100 percent of its water supply from groundwater production and does not purchase imported water from a water wholesaler.

However, CVWD and DWA are remediating the overdraft condition of the groundwater in the Upper Coachella Valley by replenishment with Colorado River and State Water Project (SWP) Exchange water from Metropolitan Water District of Southern California (MWD). The Mission Creek Subbasin Management Area contains two AOBs: the CVWD Mission Creek Subbasin AOB and the DWA Mission Creek Subbasin AOB. In calendar year (CY) 2022, total assessable production in the management area was 13,751 acre-feet (AF), a decrease of 3 percent from 2021. The assessable production in CVWD's Mission Creek Subbasin AOB was 4,390 AF, which was approximately 32 percent of total production within the management area. Since 2003, groundwater levels have risen and stabilized throughout the Mission Creek Subbasin, which is evidence that implementation of the GRP has effectively abated historical overdraft. Continued artificial replenishment is necessary to sustain these levels and prevent a return to overdraft in the future.

The project will abide by Mission Spring Water District Water Efficient Landscaping Guidelines. The intent of the MSWD Landscape Guidelines is to promote water conservation through climate appropriate plant material and efficient irrigation practices and comply with the State of California's Water Conservation in Landscaping Act. The Landscape Guidelines apply to all new and rehabilitated landscapes for private, recreational and commercial developments, including single or multifamily housing developments, and residential infill.

The Uniform Building Code (Chapter 18.52) also establishes landscape regulations to enhance the appearance of the community, establish buffers between abutting land uses and public rights-of-way, reduce heat and glare, control soil erosion, provide for the conservation and safeguard of water resources and ensure compliance with all state-mandated water conservation regulations through the efficient use of water and appropriate use of plant materials, and ensure the ongoing maintenance of landscape areas.

The project will be required to implement water conservation measures to reduce impacts to the public water supply per existing requirements. Therefore, impacts to water supplies will be less than significant.

c. Would the project result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity for the project's projected demand in addition to the provider's existing commitments?

MSWD provides water and wastewater service throughout the northern portion of the Coachella Valley and is the provider of wastewater to the project site. The District operates and manages the Horton Wastewater Treatment Plan (HWWTP) and the Desert Crest Wastewater Treatment Plant. The Horton WWTP has a capacity of 2.3 million gallons per day (MGD). The plant uses an extended aeration process for treatment and disposes of the secondary wastewater, which is not disinfected, in adjacent percolation/evaporation ponds. The average daily flow metered to the plant in 2020 was 2.0 MGD. The Desert Crest Wastewater Treatment Plant has a capacity of 0.18 MGD and serves a country club

development and mobile home park. The average daily flow to the plant in 2020 was metered at 0.05 MGD. MSWD has an ongoing program to connect existing residences currently on septic systems to sewer collectors that have been constructed or are in the process of being constructed. Since 2005, 3,520 parcels have been converted from septic to sewer service for a total of 7,700 parcels.

The District is constructing the MSWD Regional Water Reclamation Facility (RWRF) to meet increasing wastewater demands. In its initial phase, the RWRF will use a sequence batch reactor process for treatment and disposal of the secondary wastewater, which is not disinfected, in adjacent percolation/evaporation ponds located within the plant over the Garnet Hill Subarea. Located north of Interstate 10, near 20th Avenue and Little Morongo Road in Desert Hot Springs, the new facility will treat an additional 1.5 million gallons of wastewater per day. The facility will also support the addition of tertiary treatment in the future, providing recycled water to enhance the region's water conservation efforts. The regional plant and conveyance line projects are expected to be operational by the Fall of 2023.

The project is proposing a new 8-inch private sewer line that would collect flow from the development and convey it to an existing 6-inch sewer main located 650 feet east in 19th Avenue. Flows would then be delivered to the HWWTP. The proposed project is estimated to generate wastewater at 14,400 GPD or 0.01 MDG, which is 6 percent of the HWWTP plant's capacity of 2.3 MGD.

The project's final engineering plans will undergo additional review by the City of Palm Springs and Mission Springs Water District to assure compliance with all current and applicable requirements. As demonstrated above, the project is not expected to exceed the City's wastewater capacity demand and impacts are less than significant.

d. Would the project 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?

The project is proposing the development of a 739,360 square foot fulfilment center with a building footprint of 727,360 square feet allotted to warehouse uses, and 12,000 square feet for offices on the second floor. Additional solid waste will be generated by the proposed project through operation and employees. The project is expected to generate approximately 718 employees. The estimated solid waste for this project is shown below in **Table 4.15-10**.

Table 4.15-10 Solid Waste Generation

Land Use	Employees	Rate	Solid Waste (pounds per day)	Solid Waste (tons per year)
Commercial/Industrial	718	13.82 lb/employee/day	9,922.76	1,812.31
Total			**9,922.76**	**1,812.31**

Source: CalRecycle. Estimated Solid Waste Generation available at https://www2.calrecycle.ca.gov/wastecharacterization/general/rates

The project would generate an average of approximately 4.96 tons per day. This estimate does not account for any required solid waste reductions. Waste from the project site will be sent to the Edom Hill Transfer station which can receive a maximum of 3,500 tons per day, and currently processes over 1,900 tons per day. The project's 4.96 tons of solid waste is less than 1 percent of this transfers station's daily capacity, and represents a less than 1% increase in daily processing. The solid waste would then be transferred to one of the County's permitted landfills.

The Lambs Canyon Landfill is the nearest landfill. This landfill has a permitted capacity of 5,000 tons per day and 319,242,950 cubic yards of remaining capacity with a closure date of 2032. The solid waste generated by the project is approximately less than one percent of the 5,000 tons per day at the Lambs Canon landfill. Therefore, the project would be served by a landfill with sufficient capacity. Additionally, the other landfills listed in **Table 4.15-1** have sufficient capacity to meet the demands of solid waste generated by the proposed project.

The City will continue to coordinate with Riverside County regarding solid waste disposal capacity.

In addition, all future development would be required to comply with mandatory commercial and residential recycling requirements of Assembly Bill 341. The project will comply with all applicable solid waste statutes, policies and guidelines; and the project will be served by a landfill with sufficient capacity to serve the project. Therefore, impacts relative to solid waste are less than significant.

e. Would the project comply with federal, State, and local management and reduction statutes and regulations related to solid waste?

The project will comply with all applicable solid waste statutes, policies and guidelines. Palm Springs Disposal abides by Assembly Bill 341 which is a legislative declaration that it is the policy goal of the State of California that not less than 75% of solid waste generated be reduced, recycled, or composted by the year 2020. Businesses that generate 4-cubic yards of solid waste or more must arrange for recycling services as required by Assembly Bill 341. The City of Palm Springs Municipal Code (Chapter 6.04) enforces this policy. The project will be required to arrange for PSDS collection of recycled material and supply and allow access to an adequate number, size and location of collection containers with sufficient labels or colors for employees, contractors, tenants, and customers, consistent with City's collection services. The California Green Building Standards Code (CalGreen) applies to all cities in California, and mandates that all new building construction develop a waste management plan that includes diversion of at least 65% of construction and demolition material from landfills, through recycling and/or reuse. There are no impacts relative to applicable solid waste regulations because the project is required to, and will, comply with all such regulations.

4.15.5 Cumulative Impacts

New and existing local development within the City and the surrounding project area have the potential to result in cumulative impacts when combined with build-out of the City of Palm Springs General Plan. Whether these conditions would result in cumulatively significant impacts is described below.

Water Supply

Buildout of the Palm Springs General Plan could result in cumulatively significant impacts to water supplies and infrastructure if not reviewed by the City and MSWD or DWA. Like the proposed project, future development would be required to implement short-term and long-term water conservation efforts to ensure the continued availability of this resource.

In 2004, the District adopted two major conservation policy statements: a water conservation master plan and water efficient landscaping guidelines. The Water Conservation Master Plan identifies several key areas in which the District will pursue more efficient water use practices, namely: efficient landscaping guidelines; efficient landscaping requirements for new development; and xeriscape demonstration garden; efficient landscaping incentives; conservation education programs in schools, community and bimonthly billing information; tiered water pricing that encourages conservation; updated water shortage ordinance; water audits for the largest users; and rebates for water efficient plumbing fixtures. The District has a tiered rate structure for water service within its service area. The tiered rate structure is intended to discourage high water use. The District may also enact a drought surcharge, as required by Statewide drought measures.

Through the implementation of District water conservation ordinances and measures, total per-capita District water use has significantly dropped from 308.1 GPCD in 2005 to 216.0 GPCD in 2010 to 172.1 GPCD in 2015 (a reduction of 44.1% since 2005). Residential per-capita District water use has also significantly dropped from 189.8 GPCD in 2005 to 160.4 GPCD in 2010 to 121.1 GPCD in 2015 (a reduction of 36.2% since 2005). MSWD has surpassed the required 20% reduction for 2020. Many of the water conservation measures already implemented and being implemented by District customers such as turf removal, conversion to drought resistance landscapes, turf replacement, conversion to more efficient irrigation systems and ET-based irrigation controllers, retrofits to toilets and plumbing fixtures, implementation of weather-based irrigation controllers, AMI meters, etc. will have permanent effects on water use (reduction) in the future.

According to **Tables 4.15-2** through **4.15-9** MSWD has sufficient amounts of water to serve it's Planning Area based on current and future water use. Therefore, MSWD has the ability to serve the proposed project and as well as future development for the next 20-years. Therefore, the project's contribution to cumulative water impacts would have less than significant impacts.

Wastewater

The project would result in an increase to wastewater flows. The project is proposing a new 8-inch private sewer line that would collect flow from the development and convey it to an existing 6-inch sewer main located 650 feet east in 19th Avenue. Flows would then be delivered to the HWWTP. The proposed project is estimated to generate wastewater at 14,400 GPD or 0.01 MDG, which is 6 percent of the HWWTP plant's capacity of 2.3 MGD.

MSWD is constructing the MSWD Regional Water Reclamation Facility (RWRF) to meet increasing wastewater demand. The new facility will treat an additional 1.5 million gallons of wastewater per day. The regional plant and conveyance line projects are expected to be operational by the Fall of 2023. In addition, the new plant will lessen flows at the District's Alan L. Horton Wastewater Treatment Plant, extending the facility's operational life by as much as 10 years. Increased wastewater treatment capacity will support future growth in Desert Hot Springs and the surrounding areas.

The development of expanded wastewater treatment services—as proposed by the RWRF within the MSWD service area is considered a benefit to cumulative development in the future within the District's service area. The WVWRP addresses long term projections of growth and capacity needs within the MSWD service area. The District service area is anticipated to experience growth that would occur concurrently with the District's ability to serve new customers through the expanded wastewater treatment services that would be created by the implementation of the RWRF. Therefore, the project's contribution to cumulative wastewater impacts would have less than significant impacts.

Solid Waste

Buildout of the General Plan will result in the construction and operation of various land uses including residential, commercial, and industrial uses, which would result in the increase of solid waste generated in the area. As previously stated, the Lambs Canyon Landfill has 319,242,950 cubic yards of remaining capacity. Future development projects in the City will be required to comply to the same waste reduction mandates as are currently in place, and more stringent mandates if they are legislated in the future. These requirements are designed to reduce the waste stream by 75%, and will assist all projects in reducing cumulative solid waste impacts. The landfill serving the City and the project site still have an available remaining capacity and there is potential for expansion at the landfill. Therefore, cumulative impacts to solid waste would be less than significant.

Electricity

Buildout of the project, related projects, and additional forecasted growth in SCE's service area would cumulatively increase the demand for electricity supplies and infrastructure capacity. SCE's planning area consumed approximately 3,959.5 GWh of electricity in 2020. According to the CEC's Demand Analysis Office, SCE estimates that electricity consumption within SCE's planning area will be approximately 129,000 GWh annually by 2030.

The proposed project, and other future development projects would be expected to incorporate energy conservation features, comply with applicable regulations including CALGreen and State energy standards under Title 24, and incorporate energy design features. Increased efficiency, both in construction materials and fixture design, will apply not only to the proposed project, but to all cumulative projects developed within SCE's service area. Therefore, the project's contribution to cumulative impacts related to of the expansion of facilities to provide electricity would not be cumulatively considerable and, thus, would be less than significant.

Natural Gas

Buildout of the City of Palm Springs would result in additional natural gas demand within SoCalGas's service area. SoCalGas has adequate policies, programs, and projects in place to provide energy to their users, including the proposed project, for the foreseeable future. As described in **Section 4.5, *Energy Resources***, SoCal Gas projects total gas demand to decline at an annual rate of 1 percent from 2020-2035.

The project's operational consumption of natural gas will include the use of exterior cargo handling equipment involving up to four (4) 200 horsepower (hp), natural gas-powered cargo handling equipment – port tractors conservatively operating at 4 hours a day for 365 days of the year. Project on-site equipment would consume an estimated 13,926 gallons of natural gas, which is equivalent to 1,273,560.6 kBTU and 1,236,466.6 cf of natural gas. On-site cargo handling equipment used during operation of the project would consume approximately 0.15 percent of the 2030 forecasted consumption in SoCalGas's planning area. All other projects in this area of the City will be required to complete the appropriate CEQA review for significant or unmitigated impacts. Therefore, cumulative impacts of natural gas would be less than significant.

Telecommunication

Buildout of the City of Palm Springs would result in increased demand for telecommunication services. The project is located within Frontier's and Charter Communications' service areas for telecommunications. Although buildout of the City would increase demand of telecommunication services, future developments are required to participate in the design review process of telecommunication plans associated with the future development. Palm Springs is a largely built out community and infrastructure exists throughout much of the City. Physical determination prior to implementation of any project and the need for further infrastructure upgrades would similarly be accomplished through the required design review and approval plans for projects through the City, nearby jurisdictions, and the appropriate regulatory agencies and utility providers. Therefore, demand would not be cumulatively considerable and would not cause or contribute to a significant cumulative impact.

4.15.6 Mitigation Measures

No mitigation measures are required.

4.15.7 Level of Significance After Mitigation

Impacts associated with Utilities and Service Systems will be less than significant, with project compliance with all design standards of the City of Palm Springs, MSWD, SCE, and SoCalGas.

4.15.8 Resources

1. CalRecylce Estimated Solid Wase Generation Rates, CalRecycle, accessed August/September 2023
2. CalRecylce SWIS Facility / Site Activity Details, accessed August/September 2023
3. MSWD Water Authority Regional Urban Water Management Plan, accessed August 2023
4. City of Palm Springs 2007 General Plan EIR, Chapter 5.16, Utilities and Service System
5. Palm Springs Disposal Website
6. Mission Springs Water District 2019 West Valley Water Reclamation Plant Program DEIR,

Chapter 5.0 Other CEQA Sections

5.1 Purpose

This chapter of the Draft EIR addresses the additional content requirements of the State CEQA Guidelines that are not included in other chapters. The CEQA Guidelines require a section of the document to discuss significant unavoidable impacts, significant irreversible impacts (per Section 21100 (b)(2)), and growth-inducing impacts (per Section 15126.2). These topics are discussed in this chapter.

5.2 Significant and Unavoidable Impacts

Per Section 15126.2 (c) of the CEQA Guidelines, the EIR must describe any significant impacts that cannot be avoided, including those impacts that can be mitigated but not reduced to a less-than-significant level.

Chapter 4.0, *Environmental Impact Analysis*, of this EIR describes the potential environmental impacts of the project and recommends mitigation measures to reduce impacts, where feasible. As determined in the analyses presented in **Sections 4.1** through **4.15**, although the project as proposed has the potential to result in impacts to a variety of resource topics, each potential impact can be mitigated to less than significant levels through adoption of the mitigation measures, project design features and/or compliance with regulatory requirements as specified in those sections, with the exception of impacts associated with greenhouse gas (GHG) emissions and vehicle miles traveled (VMT). Significant and unavoidable impacts related to GHGs and VMT are discussed below.

Greenhouse Gas Emissions

A Project-specific Greenhouse Gas Analysis ("GHGA") was prepared by Urban Crossroads in December 2023 in order to analyze short-term construction and long-term operational impacts of the proposed High-Cube Warehouse development to greenhouse gases. As discussed in greater detail in **Section 4.7, *Greenhouse Gas Emissions***, the project is consistent with applicable plans and policies of the City of Palm Springs as well as the County of Riverside Climate Action Plan Update. However, when compared to a quantitative greenhouse gas emissions significance threshold adopted by SCAQMD, the increase in GHG emissions associated with the project is potentially significant.

Specifically, the project would result in 9,438.47 MTCO2e per year, thus exceeding the SCAQMD screening threshold of 3,000 MTCO2e per year (see **Table 4.7-2, *Project GHG Emissions*** in **Section 4.7** of this Draft EIR). The proposed project is anticipated to result in annual CO2e emissions that exceed the most conservative threshold of 3,000 MTCO2e/yr. Thus, project-related emissions are potentially significant. Therefore, the DEIR recommends that the project final plans and designs conform to

provisions of the County of Riverside CAP Update through implementation of the Screening Table Measures listed at **Table 4.7-3, *CAP Consistency – Commercial/Industrial Land Use,*** of this DEIR. The project shall implement Screening Table Measures providing for a minimum of 100 points per County Screening Tables. The City shall verify incorporation of the identified Screening Table Measures within the project building plans and site designs prior to the issuance of building permit(s). The City shall verify implementation of the identified Screening Table Measures prior to the issuance of Certificate(s) of Occupancy (see **Mitigation Measure GHG-1** in **Section 4.7**).

Example features that will reduce GHG emissions in the CAP Screening Table include the installation of roof-top solar panels, EV charging stations, enhanced duct insulation, Improved Efficiency HVAC, energy efficient appliances, and water-efficient landscaping and fixtures (**Table 4.7-3**). As shown on table **4.7-3**, the project would yield 274 points which is more than double the required 100 points. Since **MM GHG-1** yields a minimum of 100 points, with incorporation of **MM GHG-1**, the project would be consistent with the CAP Update. By achieving the 100-point minimum, the project would be consistent with the GHG Development Review Process' requirement to achieve at least 100 points and thus the project is considered to have a less than significant individual and cumulatively considerable impact on GHG emissions. Nevertheless, CAP consistency would not lower the calculated GHG emission estimates from construction and operation. Therefore, this analysis conservatively considers the project to have a significant and unavoidable impact concerning GHG emissions.

Vehicle Miles Traveled

The Palm Springs Traffic Impact Guidelines identify the Riverside County Transportation Analysis Model (RIVTAM) as the appropriate tool for conducting VMT analysis for land use projects. A comprehensive analysis of VMT was conducted for the project, and is provided in **Appendix L.2**. Project VMT was calculated using the most current version of RIVTAM. The project is projected to have approximately 718 employees (i.e., service population). As shown in Table 5-1, project-generated VMT per service population would result in 59.77 for baseline and 52.24 for cumulative conditions.

Table 5-1 Proposed Project VMT per Service Population

	Baseline	Cumulative
Project Generated VMT	42,918	37,511
Service Population	718	718
VMT per Service Population	59.77	52.24

Source: N Indian Canyon/19th Ave High-Cube Warehouse VMT Analysis, Table 2, Urban Crossroads January 2023.

As described in Section 4.13, Table 4.13-11, the proposed project's baseline and cumulative VMT per Service Population are greater than the City's impact threshold, and a potential project impact was identified for Baseline and Cumulative conditions. Palm Springs General Plan Circulation Element Policy CR1.11 encourages large employers (employers with 100 or more persons) to adopt incentive

programs that include ridesharing, fleet vehicles and vanpools, preferential parking for rideshares, subsidized shuttle bus services, telecommuting, alternative work hour programs, bicycle racks, lockers and shower rooms, and information on transit services to reduce overall traffic volumes in the City. These measures are appropriate for reducing VMT, however any associated reductions are not anticipated to result in a project VMT that is considered less than significant. The future occupant of the project will be encouraged to implement these measures; however, significant impacts are still anticipated.

5.3 Significant Irreversible Environmental Changes

CEQA Guideline Section 15126.2 (d) requires consideration and discussion of uses of nonrenewable resources during construction and operation of the project that may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and, particularly, secondary impacts (such as a highway improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also, irreversible damage can result from environmental accidents associated with a project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified.

The irreversible and irretrievable commitment of resources is the permanent loss of resources for future or alternative purposes. Irreversible and irretrievable resources are those that cannot be recovered or recycled or those that are consumed or reduced to unrecoverable forms. The proposed project would result in moderate irreversible and irretrievable commitments (during construction and operation) of the following:

- Construction materials
- Energy in the form of electricity, natural gas, and petroleum
- Land area committed to the project and the effect on biological resources; and
- Water supply for project operation

Development of the proposed project will result in the use of construction materials and resources. The California Green Building Standards Code (CALGreen) applies to all cities in California, and mandates that all new building construction develop a waste management plan that includes diversion of at least 65% of construction and demolition material from landfills, through recycling and/or reuse. The project will be required to comply with applicable solid waste regulations to ensure that the project does not result in the inefficient use of materials during construction of the project (see **Section 4.15, *Utilities and Service Systems***).

The use of these nonrenewable resources is expected to account for a minimal portion of the region's resources and would not affect the availability of these resources for other needs within the region. Construction activities would not result in inefficient use of energy or natural resources. As determined in **Section 4.5, *Energy Resources***, during construction of the project, electricity would be

consumed to supply and convey water for dust control and be used to power lighting, and electronic equipment. Electricity consumption during construction of the site is anticipated to be minimal and within the infrastructure service capabilities of SCE. Additionally, when not in use, electric equipment would be powered off so as to avoid unnecessary energy consumption.

Petroleum fuel consumed by construction equipment would be the primary energy resource expended over the course of construction, while vehicle miles traveled (VMT) associated with the transportation of construction materials and construction worker commutes would also result in petroleum consumption. As stated in **Section 4.5, *Energy Resources,*** the equipment used for project construction would conform to CARB regulations and California emissions standards, implementing idling restrictions and the use of newer engines and equipment, which would result in less fuel combustion and energy consumption. Overall, **Section 4.5** determined that project construction would not consume petroleum in a wasteful or inefficient manner.

Long-term operational activities would not result in inefficient consumption of energy and natural resources. Operation of the project site would result in the consumption of electricity, natural gas, and petroleum use during the life of the project. As determined in **Section 4.5**, the project would implement energy conservation measures and project design features compliant with state regulations such as Title 24 and CALGreen requirements related to energy efficiency. Implementing rooftop solar and energy-efficient design features will both generate electricity onsite, and reduce electricity consumption, respectively. The project will utilize water efficient plumbing fixtures, drought tolerant plants, and water efficient irrigation systems. Under future conditions, average fuel economies of vehicles accessing the project site can be expected to improve as older, less fuel-efficient vehicles are removed from circulation, and in response to fuel economy and emissions standards imposed on newer vehicles entering the circulation system. Enhanced fuel economies realized pursuant to federal and State regulatory actions, and related transition of vehicles to alternative energy sources (e.g., electricity, natural gas, biofuels, hydrogen cells) would likely decrease future gasoline fuel demands per VMT. Although project-related VMTs were determined to be significant and unavoidable, (see **Section 4.13, *Transportation***), petroleum consumption would not be expected to result in significant impacts because average fuel economies of vehicles accessing the project site can be expected to improve as older, less fuel-efficient vehicles are removed from circulation, and in response to fuel economy and emissions standards imposed on newer vehicles entering the circulation system. Enhanced fuel economies realized pursuant to federal and State regulatory actions, and related transition of vehicles to alternative energy sources (e.g., electricity, natural gas, biofuels, hydrogen cells) would likely decrease future gasoline fuel demands. Finally, the location of the project within 0.3 miles of an Interstate 10 interchange also tends to reduce the miles traveled experienced by both vehicles and trucks within the region, acting to reduce regional vehicle/truck energy demands. The project will not interfere with increased full efficiency standards and will not result in wasteful, inefficient, or unnecessary consumption of transportation energy resources during operation.

The construction of the proposed project will result in irreversible changes to the physical environment of the project site, which is currently vacant and undeveloped. The site is surrounded by vacant lands to the west and north, commercial uses to the south, and industrial uses to the east. The project site consists of plants in the creosote bush scrub plant community. The project's vacant and undeveloped condition provides suitable habitat for wildlife species, however, the project's adjacency to the busy Indian Canyon Drive roadway and existing industrial and commercial businesses do not present ideal conditions for wildlife corridors or native wildlife nursery sites. Additionally, during the biological survey, no concentration of animal tracks was found on or near the project boundaries. Track concentrations can be an indicator of wildlife corridors. However, nesting birds and burrowing owls have the potential to occur given the site conditions and vegetation found on the site. Therefore, the project is required to conduct a burrowing owl clearance survey 14 to 30 days prior to site disturbance (grubbing, grading, and construction) to determine whether burrowing owls occurring at the site and a preconstruction nesting bird survey to protect migratory nesting birds. Burrowing owls and nesting birds are covered under the Migratory Bird Treaty Act (MBTA), which prohibits the take, possession, import, export, transport, selling, purchase, barter, or offering for sale, purchase or barter, any migratory birds, their eggs, parts, and nests, except as authorized under a valid permit by the Department of Interior U.S. Fish and Wildlife Service. The project's implementation of clearance and pre-construction surveys will ensure that take of burrowing owls or migratory nesting birds does not occur (see **Section 4.3, *Biological Resources***).

Construction and operation of the proposed project will generate demand for water resources. As a standard requirement by the City of Palm Springs (Chapter 11.06.050, Water Conservation Requirements, in the City Municipal Code) the project will implement water conservation methods to assure the most efficient use of water resources. The water conservation methods include using native plant materials and drought tolerant plants. The project will also install and maintain efficient on-site irrigation systems to minimize runoff and evaporation and maximize effective watering of plant roots via drip irrigation; and install low-flush toilets. The project proposes the operation of a 739,360-square-foot building and will result in the consumption of 105,673.8 gallons of water per day (gpd), which equates to 118.37 acre-feet per year (AFY). MSWD's long-term water management planning ensures that adequate water supplies are available to meet existing and future water needs within its service area by assessing the reliability of water sources over a 20-year planning horizon every 5 years through their Urban Water Management Plan. As shown in **Table 4.15-6, *MSWD Projected Urban Water Supplies***, MSWD's current urban water demand was 8,269 acre-feet (AF) for 2020, and the projected urban water demand is 8,996 by 2025 and 17,494 AFY by 2045. This project's water demand of 118.37 AFY accounts for approximately 1.32 percent of the total planned increase in demand of 8,996 AFY by 2025 and 0.68 percent of the total planned increases in demand of 17,494 AFY by 2045. Considering the groundwater basin management efforts presented throughout the RUWMP, the historical groundwater supply availability is assumed to be fully reliable and an accurate assumption for future reliability. This is discussed in **Section 4.15**, ***Utilities and Service Systems***.

Although impacts would be less than significant with mitigation, such impacts would be considered irreversible. Further, construction and/or operation of the proposed project would require the use of resources that include, but are not limited to, soils, gravel, concrete, and asphalt, lumber and other related forest products, petrochemical construction materials, steel, copper, and other metals, water, fuels, and energy. As such, the proposed project would result in the short-term and long-term use of fossil fuels and other nonrenewable resources. However, the use of the fuels and resources would result in less than significant impacts because the equipment used for project construction will be required to conform to CARB regulations and California emissions standards regarding retrofitting, repowering, or replacement of diesel off-road construction equipment. Compliance with anti-idling and emissions regulations would result in a more efficient use of construction-related energy and the minimization or elimination of wasteful or unnecessary consumption of energy. Additionally, the proposed project will be designed and constructed in accordance with the City's latest adopted energy efficiency standards, which are based on the California Title 24 energy efficiency standards. Construction and operational electricity use was determined to result in less than significant electricity use. According to the CEC's Demand Analysis Office, SCE estimates that electricity consumption within SCE's planning area will be approximately 129,000 GWh (which is 129,000,000 MWh) annually by 2030. Based on the project's estimated annual electrical consumption of 3,673,072 MWh, the project would account for approximately 3 percent of SCE's total estimated demand in 2030. Moreover, SCE continues to invest in alternative and renewable energy sources and storage of renewable energy, to provide alternative energy to the service area. The 2021 SCE Power Mix has renewable energy at 31.4% of the overall energy resources. Geothermal resources are at 5.7%, wind power is at 10.2%, large hydroelectric sources are at 2.3%, solar energy is at 14.9%, and coal is at 0%. Finally, the California Green Building Standards Code (Cal Green) applies to all cities in California, and mandates that all new building construction develop a waste management plan that includes diversion of at least 65% of construction and demolition material from landfills, through recycling and/or reuse. Therefore, the project's use of fossil fuels and other nonrenewable resources during construction and operation would result in less than significant impacts. See **Section 4.5, *Energy Resources*, Section 4.3, *Biological Resources*,** and **Section 4.15, *Utilities and Service Systems***, of this Draft EIR for more detailed discussion.

5.4 Growth-Inducing Impacts

Section 15126.2 (e) of the CEQA Guidelines requires the EIR to discuss the ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly (e.g., by proposing new homes or businesses) or indirectly (e.g., through extension of roads or other infrastructure).

A project is defined as growth inducing when it directly or indirectly:

1. Fosters population growth

2. Includes the construction of additional housing in the surrounding environment
3. Removes obstacles to population growth
4. Taxes existing community service facilities, requiring construction of new facilities that could cause significant environmental effects
5. Encourages or facilitates other activities that could significantly affect the environment, either individually or cumulatively

It must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment.

As stated throughout this Draft EIR, the proposed project site is currently vacant and undeveloped. The project proposes the development of a 739,360-square-foot fulfillment center on approximately 38 acres.

The proposed project would employ approximately 718 people (based on estimates generated by Urban Crossroads, Inc., in the VMT Analysis) (**Appendix L.2**). The proposed industrial project would result in employment-based population growth from the proposed employment-generating industrial use. Many of these new jobs could be filled by working residents already residing within the City or the Coachella Valley region.

As of 2023, the City of Palm Springs has a total population of 44,092 people (Department of Finance). The Palm Springs General Plan anticipates that the City population would increase to 94,950 residents at total buildout of the City. SCAG forecasts that the City of Palm Springs will have approximately 61,600 people by 2045.

The unemployment percentage in the Coachella Valley ranges from 5.5 percent in Palm Springs to 11.5 percent in the city of Coachella (CVEP 2023 Economic Report). Additionally, according to 2019 Local Profiles reports by SCAG, a high percentage of neighboring cities' residents commute outside of the city they reside in for work. Therefore, it is reasonable to assume that unemployed residents in the Coachella Valley could account for the projected employee population of 718 employees for the proposed project.

If all 718 employees would be relocating from outside of Palm Springs to the City, the project's 718 employees would increase the population of the City by approximately 1,270 residents based on the 2023 Department of Finance persons per household number for the City.

This is an increase of approximately 2.9 percent to the 2023 population numbers of the City, and still below the projected City's buildout and SCAG's 2045 population forecasts of 94,950 and 61,600 people, respectively. However, as stated above, many of these new jobs are expected to be filled by workers already residing within the City or the Coachella Valley region. Although buildout and full occupancy of the project could potentially result in a 2.9 percent population increase of the current City population, per SCAG, this increase is consistent with City and regional growth projections.

Therefore, the project would not result in a substantial unanticipated population increase in the City. Impacts would be less than significant.

The proposed project lies adjacent to existing paved roadways, Indian Canyon Drive (east) and 19th Avenue (south). Extensions of these roadways are not proposed as part of project implementation. Access to the site will occur on Indian Canyon Drive and 19th Avenue.

The project will be required to connect to existing electrical power located along Indian Canyon Drive, via overhead distribution power poles. The project will coordinate with Southern California Edison (SCE), the local electricity provider, to connect to the existing facilities. The project's connection will be constructed to the design standards of and in coordination with SCE. The proposed improvements (i.e., connection) must be approved by SCE to ensure the design standards are met.

The project, and future projects allowed within the surrounding area would increase demand for electricity power provided by SCE. Although the project and future projects will increase demand for electricity, the projects' (both proposed project and future projects) participation in the DCE would provide alternative energy sources to the site. The DCE provides renewable power sources such as solar, wind, and geothermal in addition to large hydroelectric (which is considered carbon free but not renewable) to their service area. SCE has met or exceeded all Renewable Portfolio Standard requirements to date, procuring renewable energy from diverse renewable sources (listed above). This standard requires all California utilities to generate 33 percent of their electricity from renewables by 2020, 60 percent of their electricity from renewables by 2030, and 100 percent by 2045. SCE's Pathway 2045 program will achieve carbon neutrality by decarbonizing all sectors of the economy and will necessitate rigorous planning to keep energy safe, reliable and affordable. 80 gigawatts (GW) of new utility-scale clean generation and 30 GW of utility-scale energy storage will be required in the next 25 years.

Additionally, the project and future projects would be subject to the California Building Code, including California Energy Code and Cal Green, an evolving set of energy efficiency standards for residential and nonresidential buildings implemented to minimize the wasteful and inefficient use of energy. These regulations require the installation energy efficient appliances and efficient water fixtures and achieve zero-net-energy design through the installation of PV solar panels. The proposed project and other future development projects would be expected to incorporate energy conservation features, comply with applicable regulations including CALGreen and State energy standards under Title 24, and incorporate energy design features, as required.

Existing water lines currently occur along Indian Canyon Drive and 19th Avenue, adjacent to the project property. The project will connect to the existing MSWD domestic water line. The project proposes to connect to existing MSWD sewer infrastructure approximately 650 feet east of the project along 19th Avenue. The project will extend the existing sewer lines to the project site. Extensions of MSWD sewer infrastructure are required to support growth in the City and surrounding

area, and MSWD has accounted for this growth in its Wastewater System Comprehensive Master Plan.

Although the project would extend the existing sewer infrastructure to the site, this would not result in indirect growth inducing impacts that were not anticipated by MSWD and the City of Palm Springs. The infrastructure will provide sewer services to the industrial and commercial land uses along 19th Avenue. Therefore, the proposed project would not contribute to substantial population or housing growth unexpected by the City of Palm Springs, and growth inducing impacts will be less than significant.

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Chapter 6.0 Effects Found to Have No Impact

As discussed in **Chapter 1.0, *Executive Summary***, the City of Palm Springs (City) is the lead agency for the CEQA environmental review of the proposed Fulfillment Center project ("project"). The City has prepared this Draft EIR in compliance with CEQA, including Section 15128 of the CEQA Guidelines which requires a brief description of resource topics that were determined to have no potential impacts related to the proposed project, and were therefore eliminated from further assessment.

Prior to preparation of this Draft EIR, an Initial Study and Notice of Preparation were prepared. The following discussion presents the analysis of the effects related to entire resource categories or select thresholds within a category for aesthetics, agriculture and forestry, biological resources, geology and soils, hazards and hazardous materials, land use and planning, mineral resources, noise, population and housing, public services, recreation, and wildfire determined to have no potential to impact the environment in the Initial Study, per the 2023 CEQA Guidelines. The Initial Study, Notice of Preparation and comments received during the public review period can be found in **Appendix A**.

6.1 Aesthetics

Threshold b: Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

The proposed project occurs north of 19th Avenue and west of Indian Canyon Drive. The project site is currently vacant and undeveloped. The property does not contain any landmarks or scenic resources, such as trees, rock outcroppings, or historic buildings.

A review of the California State Scenic Highway Program determined that the project site is not located within a designated State Scenic Highway. State Route 62 is approximately 3 miles west of the project site and is a State designated Scenic Highway. The project site is not visible from SR 62. According to the Riverside County Western Coachella Valley Area Plan, the Interstate 10 freeway is a County Eligible Scenic Highway but is not officially designated. The Interstate 10 freeway is located approximately 0.32 miles south of the project. Therefore, the project will not impact scenic resources in the Interstate 10 right of way.

The project is not located adjacent to a State designated Scenic Highway or a Riverside County Scenic Highway. There will be no impact to scenic resources on a scenic highway.

6.2 Agriculture and Forestry Resources

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997)

prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. Would the project:

Threshold 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?

Threshold b: Conflict with existing zoning for agricultural use, or a Williamson Act contract?

The project property is classified by the 2016 California Farmland Mapping and Monitoring Program (FMMP) as "Other Land". Other Land is defined as land not included in any other mapping category (i.e., Prime Farmland, Farmland of Statewide or Local Importance, Unique Farmland, or Urban and Built-Up Land).

Surrounding areas to the west, north, and east are also designated as Other Land, while areas south of the project include a mix of both Other Land and Urban and Built-Up Land. No areas within the City of Palm Springs are designated or zoned for agricultural use. Therefore, implementation of the project would not involve changes that would result in the conversion of Prime Farmland, Unique Farmland or Farmland of Statewide Importance to nonagricultural uses.

The General Plan land use designation for the project site is Industrial with Wind Energy Overlay. The zoning designation for the proposed project is Manufacturing (M-2). The proposed project is compliant with the land use and zoning designations established by the City of Palm Springs.

According to the Williamson Act 2014 Status Report, no portion of the project site is within or near a recognized Williamson Act Contract area.

Neither the project site nor any surrounding lands are designated or used for agricultural purposes. Agriculture is not a land use defined in either the General Plan or Zoning Ordinance. No impact to agricultural resources will result from implementation of the project.

Threshold c: Conflict with existing zoning for, or cause rezoning of forest land, timberland, or timberland zoned Timberland Production?

Threshold d: Result in the loss of forest land or conversion of forest land to non forest use?

Threshold e: Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?

The project site is currently vacant and undeveloped. As stated in the previous discussion (b), Industrial with a Wind Energy Overlay classifies the property's land use designations. Forest land, timberland, or timberland zoned Timberland Production does not occur on the project site or

surrounding areas. The project would not result in the loss of forest land or conversion of forest land to non-forest use.

Project implementation will not involve changes that could result in the conversion of farmland, to non-agricultural use or conversion of forest land to non-forest use since the project property is not designated as farmland or used as agricultural land. No impacts are anticipated.

6.3 Biological Resources

Threshold b: Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Wildlife or US Fish and Wildlife Service?

The site is vacant and undeveloped, and surrounded by developed and undeveloped properties. Off-site improvements involve the project's connection to existing sewer, water, and electricity lines in the streets east and south of the project. There are no jurisdictional waters regulated pursuant to the Federal Clean Water Act (CWA) by the U.S. Army Corps of Engineers (USACE) or the Regional Water Quality Control Board (RWQCB), and no lakes, rivers, or streambeds regulated pursuant to the California Fish and Game Code by the CDFW are present within the limits of the proposed project or the proposed off-site infrastructure. Since significant wash vegetation, riparian vegetation, or other sensitive natural communities (identified in local or regional plans, policies, and regulations, or by the CDFW or US Fish and Wildlife Service) does not occur at the project site or within the existing rights-of-way where off-site improvements will occur, the project will have no impacts on these resources.

Threshold 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?

The vacant and undeveloped project site does not contain federally protected wetlands, marshes or other natural drainage features. No blue-line stream corridors (streams or dry washes) are shown on U.S. Geological Survey maps for the project site and there are no botanical indicators of such corridors. As a result, implementation of the proposed project would not result in the direct removal, filling or other hydrological interruption to any of these resources. Off-site improvements involve the project's connection to existing sewer, water, and electricity lines in the streets east and south of the project. The existing rights-of-way are developed and the project's connection to off-site infrastructure will not result in impacts to protected wetlands.

6.4 Geology and Soils

Threshold a.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.

The City of Palm Springs, similar to most of Southern California, is susceptible to earthquakes due to the active faults that traverse the Coachella Valley. The potential for ground rupture due to fault movement is commonly related to the seismic activity of known fault zones on a property. Active faults are present along the northernmost reaches of the City, where the traces of the Garnet Hill and Banning faults have been mapped. These faults have the potential to generate surface rupture or ground deformation. The closest fault to the project property is the Banning Pass Fault, which lies approximately 0.25 miles north of the project, while the San Gorgonio Pass Fault is located approximately 4 miles west of the project. The Garnet Hill Fault is located approximately 1 mile south of the project; however, this fault is not considered an Alquist-Priolo Earthquake Fault. According to Figure 6-1 in the PSGP, the Banning Pass Fault traverses the northern boundary of the City, and the San Gorgonio Pass Fault delineates a portion of the City's northern boundary, but neither fault occurs on or adjacent to the project site.

Due to the project's distance from the faults, rupture at the project site is not anticipated to occur. No impacts are anticipated.

Threshold a.iii): Seismic-related ground failure, including liquefaction?

The Safety Element of the Palm Springs General Plan indicates that liquefaction occurs when loose, soft, unconsolidated, or sandy soils that are saturated with water are subjected to ground vibrations during a seismic event. Significant ground shaking causes soil to lose strength and "liquefy," triggering structural distress or failure due to settling of the ground or loss of strength in the soils underneath structures. Per the PSGP, the northern and eastern areas of the City have a low possibility of being affected by liquefaction due to the deep groundwater depths (greater than 50 feet). The Seismic Hazards Map (Figure 6-1) of the PSGP indicates that the project site is located in an area with fine-grained granular sediments susceptible to liquefaction but with groundwater depths greater than 50 feet.

Due to the lack of shallow groundwater at and around the project site, impacts of seismically-induced liquefaction at the project property and offsite improvements are not expected to occur. No impacts are anticipated.

Threshold a.iv): Landslides?

Secondary effects of seismic ground shaking, such as slope failures, rockfalls and landslides may occur in the City, especially adjacent to and in elevated areas. Seismically induced landslides and rockfalls can be expected primarily in the western and southern portion of the City, including areas near the San Jacinto and Santa Rosa Mountains where the bedrock is intensely fractured or jointed. The project site is not located in an area with high and moderate susceptibility of being impacted by rockfalls and seismically induced landslides (PSGP Figure 6-2, Landslide Susceptibility).

Seismically-induced rockfalls and landslides are not anticipated to impact the proposed project as the project site and proposed offsite improvements are located on relatively flat land. Additionally, the project and offsite infrastructure are not located adjacent to a mountain or hillside area. Therefore, seismically-induced rockfalls and landslides will have no impact on the project.

Threshold e): Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

Mission Springs Water District provides sewer services to the residents and businesses around the project property. The project site is not currently connected to sewer infrastructure; thus, the project proposes to augment the existing network of sewer lines to accommodate new construction. The project will connect to an existing 6-inch sewer line a half-mile east of the project in 19th Avenue. Therefore, no impacts are anticipated.

6.5 Hazards and Hazardous Materials

Threshold c: Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

The project site is not located within a quarter mile of an existing or proposed school. The closest school to the project site is Two Bunch Palms Elementary School, located approximately 2.95 miles northeast of the project site.

Due to the project's distance from any existing or proposed school, the project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or wastes within a one-quarter mile radius of a school. No impacts to existing or proposed schools are anticipated.

Threshold 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?

The project is located within the City's Industrial land use and is surrounded by industrial buildings and commercial businesses to the south and east.

Pursuant to the Cortese List Government Code 65962.5 and its subsections, record searches on the project property were performed within GeoTracker, EnviroStor and the EPA Enforcement and Compliance History Online (ECHO). The search of all three databases revealed that the project site is not a hazardous materials release site, and therefore, development of the site would not create a significant hazard to the public or the environment.

The project site is not located on a site which is included on a list of hazardous materials sites, and, as a result, would not create a significant hazard to the public or the environment. No impacts are anticipated.

Threshold 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?

The project is not located within an airport land use plan or private airstrip. The Palm Springs International Airport is located approximately 5 miles to the southeast and the Bermuda Dunes Airport is located approximately 18.60 miles southeast of the project. As a result, the project is located outside each of the airports' influence and planning area. Flights approaching and departing the Palm Springs International Airport and Bermuda Dunes Airport may fly over the City and the project site with intermittent frequency; however, impacts are not anticipated.

Due to the project's distance from the regional airports, no impacts are anticipated.

Threshold g: Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

The project property, located at the northwest corner of Indian Canyon Drive and 19th Avenue is currently vacant and undeveloped. The project is surrounded by existing industrial and commercial facilities to the south and east, vacant land to the north, and wind turbines to the west. According to Cal Fire's Fire Hazard Severity Zone Maps, the project site is not located within or near a moderate, high, or very high fire severity zone. The closest established fire severity zone to the project is located approximately 3.20 miles northwest of the project along State Route 62. The project site is not located in an area designated as moderate, high, or very high fire severity zone.

Impacts of wildfires are not anticipated at the project site.

6.6 Land Use and Planning

Threshold a: Physically divide an established community?

The project property is currently vacant and undeveloped. The project's southern and eastern boundaries are delineated by 19th Avenue and Indian Canyon Drive, respectively. Existing industrial and commercial businesses are located south of 19th Avenue and east of Indian Canyon Drive. The property north of the project is vacant, while the property west of the project includes vacant property and wind turbines. The surrounding properties operate separately from each other. The project is proposing the construction and operation of an industrial warehouse with associated parking, drive aisles, and landscaping. Therefore, project implementation is not anticipated to divide an established community. No impact is expected.

Threshold 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?

The project site's General Plan land use is classified as Industrial with a Wind Energy Overlay (WEO). Industrial land use designations typically include research and development parks, light manufacturing, laboratories, and industrial services. Retail commercial uses and offices are allowed as ancillary uses to the industrial use to encourage projects that are self-sustaining. Wind Energy Overlay areas allow for the development of Wind Energy Conversion Systems (WECS) and clean energy uses within the northern portion of the City. The WEO is applied at the property owner's discretion, and assumes that all lands under the overlay would result in only 15 percent of the entire acreage allotted to industrial and regional business center land uses. The entire WEO extends from the edge of Miralon, west of Windy Point, and up to Dillon Road. The proposed project's use of the land as a distribution facility will reduce the total lands available for WECS projects by only 38 acres. Additionally, it is the intention of the City to concentrate the industrial and regional commercial land uses in the area around the Interstate 10 freeway, Indian Canyon Drive, and Gene Autry Trail. Therefore, the development of the proposed project will have no impact on the City's ability to reach its goal of implementing WECS projects within the WEO boundary.

The project's zoning designation is classified as Manufacturing (M-2). The M-2 Zone, per Section 92.17.1.00 in the Palm Springs Municipal Code, is intended to provide for the development of warehouse and distribution centers, and industrial uses. The M-2 zone is consistent with the General Plan Industrial land use designation.

The project proposes an approximately 739,360-square-foot industrial warehouse. The proposed industrial warehouse is an allowed use in the City's Industrial land use and M-2 zoning designations. The project will be consistent with the development standards provided by the City. Additionally, the project will be required to prepare and submit a Development Permit to the City for review and approval. The Development Permit ensures that a proposed development is consistent with the General Plan, the Zoning Code, and other adopted plans, regulations and policies of the City. The

Development Permit also ensures that the location, height, massing, and placement of the proposed development is consistent with applicable standards.

Goal LU3 of the Palm Springs General Plan Land Use Element aims to attract and retain high-quality industrial and business park developments. The following policies are relevant to the project:

LU3.2: Promote opportunities for expansion and revitalization of industrial uses within the City.

LU3.3: Ensure operation of industrial uses is unobtrusive to surrounding areas and prohibit the development of manufacturing uses that operate in a manner or use materials that may impose a danger on adjacent uses or are harmful to the environment.

Consistency: The project proposes the development of an industrial warehouse on approximately 38 acres at the northwest corner of 19th Avenue and Indian Canyon Drive. The project will expand the industrial uses within the City. Additionally, the industrial project will not be obtrusive to surrounding areas since surrounding properties include industrial and commercial businesses.

The project is consistent with the Palm Spring General Plan land use designation and policies, as well as zoning designation. Therefore, no impacts are expected.

6.7 Mineral Resources

Threshold 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?

Mining activities have been seen in the Santa Rosa and San Jacinto Mountains, along with the high desert areas since the late 1800s. Established mining areas within Palm Springs include minerals such as: asbestos, beryllium, gold, limestone, tungsten, copper, garnet, and tourmaline. Limestone deposits, however, are the most common. To ensure the protection of important mineral resources, the Surface Mining and Reclamation Act of 1975 (SMARA) developed mineral land classification maps and reports to identify the presence or absence of suitable sources of aggregate (sand, gravel or stone deposits) into Mineral Resource Zones. Local agencies, including the City of Palm Springs, utilize the existing information on mineral classifications for land use and plan development and decision making.

According to the Palm Springs General Plan the project and its surroundings are located within Mineral Resource Zone 3 (MRZ-3), which applies to areas containing mineral deposits where the significance cannot be evaluated from available data.

The project is located in an existing service/manufacturing zone, surrounded by other manufacturing/commercial development which is incompatible with mining operations; therefore, project implementation would not result in the loss of any known mineral resources that are considered important to the Coachella Valley or residents of California. No impacts are expected related to the loss of availability of known mineral resources.

Threshold 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?

Mineral resources that are known to exist in the Coachella Valley region primarily consist of sand and gravel (aggregate) typically deposited along and near local drainages. Aggregate material is deemed necessary to the local building industry as a component of asphalt, concrete, road base, stucco and plaster. Local or regional construction industries tend to be dependent on readily available aggregate deposits within reasonable distance to the market region. The project site is not recognized as a mineral resource recovery site delineated in the County of Riverside General Plan, City of Palm Springs General Plan or the resource maps prepared pursuant to SMARA. No impacts are expected as a result of project implementation.

6.8 Noise

Threshold 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?

The closest airport to the project site is the Palm Springs International Airport, located at 3400 East Tahquitz Canyon Way, approximately 4.90 miles southeast of the project property. The project site is located outside of the 70, 65 and 60 CNEL noise contours associated with the airport. Furthermore, the Palm Springs Airport Land Use Plan does not identify the project site as being located within its planning area. No impacts are expected.

6.9 Population and Housing

Threshold b: Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

The proposed project will not displace existing housing, affordable housing, or people because the site is currently vacant and undeveloped and does not currently house anyone. No impacts are expected.

6.10 Public Services

Threshold a: Would the project result in substantial adverse physical impacts associated with the provision of new of 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:

Schools:

The City of Palm Springs, including the project site, is served by the Palm Springs Unified School District (PSUSD). The project proposes the development and operation of a 739,360-square-foot industrial warehouse. In 2022, The City of Palm Springs had a population of 44,165 people (DOF). The Palm Springs General Plan anticipates that the City population would increase to 94,950 residents at buildout of the City. The project is not anticipated to generate a new population, as employees needed to operate the project are anticipated to come from within the project region due to the unemployment rates throughout the Coachella Valley. Thus, the project would not result in a substantial increase of population in the City during construction or operation of the project, creating a substantial increase in school age children requiring public education.

Although the project will not create a direct demand for school services, Assembly Bill 2926 and Senate Bill 50 (SB 50) allow school districts to collect "development fees" for all new construction for residential/commercial and industrial use. At the time of this writing, developer fees are $0.304/sq. ft. for industrial development. Monies collected are used for construction and reconstruction of school facilities, and have been designed to mitigate the impacts to school facilities. The project applicant will be required to contribute to these fees and there would be no impacts to schools.

Parks:

The City of Palm Springs provides public parks, open space and multi-city recreational facilities with various amenities. The proposed fulfillment center project would not create additional demand for public park facilities, nor result in the need to modify existing or construct new park facilities because It is an industrial land use. If the project's employees are new residents occupying new housing units in the City, those residential projects would contribute Quimby fees or construct parks consistent with the City's standard requirements. Therefore, the project would have no impact on recreational facilities.

Other Public Facilities:

No increase in demand for government services or other public facilities is expected because the project will not result in substantial unplanned growth. Additionally, the project will pay development impact fees to support the demand for fire and police services. No impacts are anticipated.

6.11 Recreation

Threshold 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?

Threshold 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?

Palm Springs owns and maintains 156 acres of developed parkland, 160 acres of City-owned golf courses open to the public, as well as miles of developed greenbelts along major accesses throughout the city. Privately owned golf courses are also a part of Palm Springs' recreational uses, many of which are open to the public. The City contains local parks, specialty parks, neighborhood parks, golf courses, greenbelts, public parkways, and state, federal, and tribal parks. Palm Springs requires a minimum of 5 acres of developed parks be available for every 1,000 residents, including 2.5 acres for neighborhood and community parks. For almost 44,165 residents, the city of Palm Springs currently has 316 acres of developed park area, or a ratio of 7.15 acres per 1,000.

The project proposes to construct a 739,360-square-foot fulfillment center on approximately 38 acres of vacant land on the northwest corner of 19th Avenue and Indian Canyon Drive. No residential land uses are proposed. The project is not anticipated to result in a substantial increase in population, since project-generated employees would likely be existing residents of the City or the surrounding area, due to the unemployment rate. No impacts related to the increased use of existing neighborhood and regional parks, or other recreational facilities are expected.

The project is not anticipated to increase the use of existing parks since the project is proposing an industrial warehouse, and the modest increase in jobs created by the project is not expected to attract any meaningful increase in residents to the City who would use the existing park facilities.

6.12 Wildfire

Threshold a: Substantially impair an adopted emergency response plan or emergency evacuation plan?

Threshold 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?

Threshold c: Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water resources, power lines or other utilities)

that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

Threshold 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?

Wildfire risk is related to a number of parameters, including fuel loading (vegetation), fire weather (winds, temperature, humidity levels, and fuel moisture contents), and topography (degree of slope). Steep slopes contribute to fire hazards by intensifying the effects of wind to make fire suppression difficult. Fuels such as grass are highly flammable because they have a high surface area to mass ratio and require less heat to reach the ignition point.

The approximately 38-acre project site is vacant and undeveloped land with scattered, low-lying desert vegetation at the northwest corner of 19th Avenue and Indian Canyon Drive. The site is surrounded by vacant and undeveloped land to the north, an industrial development to the east (separated by Indian Canyon Drive), commercial businesses to the south (separated by 19th Avenue), and vacant land and wind turbines to the west.

According to Cal Fire's Fire Hazard Severity Zones (FHSZ) in State Responsibility Areas (SRA) Map, the project is not located in an area classified as having a moderate, high or very high fire hazard severity zone (VHFHSZ). Additionally, the project property is not located in or near lands classified as moderate, high, or very high FHSZ. The closest designated area is located approximately 3.20 miles northwest of the project and is classified as being a moderate FHSZ. Due to the project's distance from SRAs and areas designated as VHFHSZ, no impacts are anticipated, and no further analysis is required.

The project site is not located near slopes. The project is not located in or near an SRA, or in an area classified as a VHFHSZ. Therefore, the project site is not expected to expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of wildfire. The project would not expose people or structures to a significant risk of loss, injury, or death involving wildland fires because the site and surrounding areas do not have dense vegetation or steep slopes. Therefore, the project would not 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 as a result of a wildfire. No impacts are anticipated.

Chapter 7.0 Alternatives

7.1 Introduction

This chapter provides a comparative analysis of the environmental effects of alternatives to the proposed Palm Springs Fulfillment Center project ("project"). This analysis has been prepared in accordance with the California Environmental Quality Act (CEQA) Guidelines. Per CEQA, it is required that an environmental impact report (EIR) describe a range of reasonable alternatives to the project, or to the location of the project, that would feasibly attain most of the objectives of the project while avoiding or substantially lessening any of the significant environmental impacts of the project. An EIR must include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project. This section identifies and describes alternatives to the proposed project, evaluates the environmental impacts that would result from each of these alternatives, and compares these with the proposed project, as required by CEQA.

Key provisions of the State CEQA Guidelines (Section 15126.6) relating to this alternative's analysis are summarized below:

- The discussion of alternatives shall focus on alternatives to the project or its location which would feasibly attain most of the project objectives and are capable of avoiding or substantially lessening any significant effects of the project.
- The No Project Alternative shall be evaluated along with its impact. The No Project analysis shall discuss the existing conditions.
- Additionally, the alternatives analysis shall discuss what would be reasonably expected to occur in the foreseeable future if the project is not approved, based on current plans and consistent with available infrastructure. This is analyzed in the Alternatives Considered and Rejected subheading.
- The range of alternatives required in an EIR is governed by a "rule of reason" that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project.
- Only alternative locations that would avoid or substantially lessen any of the significant effects of the project need to be considered for the inclusion in the EIR. However, if the lead agency concludes that no feasible alternative locations exist, it must disclose the reasons for this conclusion, and should include the reasons in the EIR.
- Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries (projects with a

regionally significant impact should consider the regional context), and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site (or the site is already owned by the proponent). No one of these factors establishes a fixed limit on the scope of reasonable alternatives.

- An EIR need not consider an alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative.

7.2 Project Objectives

Pursuant to the State CEQA Guidelines, Section 15124(b), the description of the project includes the following statement of objectives for the project, including the underlying purpose of the project and its benefits, which can be used by the decision makers to help identify and evaluate a reasonable range of alternatives, as well as make findings and a statement of overriding considerations, if necessary. In order to ensure the functional integrity, economic viability, environmental sensitivity, and positive aesthetic contribution of the project, the following project objectives were established:

- Promote quality development consistent with the goals and policies of the Palm Springs General Plan.
- Develop a state-of-the-art industrial fulfillment center in the Industrial land use area in Palm Springs that is consistent in use and look with the existing developments in the surrounding area.
- Provide employment opportunity and growth in the City's Industrial land use designation north of the Interstate 10 freeway.
- Concentrate nonresidential uses near existing roadways, highways, and freeways in an effort to isolate and reduce any potential environmental impacts related to truck traffic congestion, air emissions, industrial noise to the greatest extent feasible.
- Create a project that takes advantage of existing infrastructure, including the proximity to major regional roadways, such as Interstate 10, and other similar infrastructure.

7.3 Summary of Project Impacts

Project- and cumulative-level impacts associated with implementation of the proposed project are evaluated in **Sections 4.1** through **4.15** of this Draft EIR. As identified in **Table 1-2**, in **Chapter 1.0** (***Executive Summary***), construction and/or operation of the proposed project would have the potential to cause the following significant but mitigable to less than significant environmental impacts:

- Impacts to candidate, sensitive or special status species (MM BIO-1, BIO-2, and BIO-3).
- Impacts to migratory nesting birds covered under the MBTA and CDFW Section 3503 (MM BIO-2).

- Impact to a Habitat Conservation Plan (i.e., Coachella Valley Multiple Species Habitat Conservation Plan) (MM BIO-1).
- Impact to an archaeological resource pursuant to Section 15064.5 during ground disturbing activities (i.e., clearing and grading during construction) (MM CUL-1)
- Impacts to foundational or building conditions from strong seismic ground shaking (MM GEO-1 through GEO-7).
- Impacts to topsoil erosion during construction and operation (MM GEO-10).
- Unstable foundation and site conditions from liquefaction, landslide, lateral spreading, subsidence, or collapse (MM GEO-1 through GEO-9).
- Impacts from potential expansive soils onsite (MM GEO-1 through GEO-11).
- Impacts to nonrenewable paleontological resources in the undisturbed native soils below the surface (MM GEO-12 and GEO-13).
- Substantially increase hazards during construction of the site (MM TRA-1).
- Provide inadequate emergency access during construction of the site (MM TRA-1).

Construction and/or operation of the proposed project would have the potential to cause the following significant and unavoidable environmental impacts:

- Result in vehicle miles traveled inconsistent with CEQA Guidelines Section 15064.3, subdivision (b).
- Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.
- Result in a conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

7.4 Alternatives Considered & Rejected

State CEQA Guidelines Section 15126.6(c) requires an EIR to identify any alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process, and to briefly explain the reasons underlying the agency's determination. Additionally, alternatives may be eliminated from detailed consideration in the EIR if they fail to meet most of the project objectives, or do not avoid any significant environmental effects. This section identifies the alternative considered but rejected as infeasible.

CEQA Guidelines require examination of an alternative location for the project if such locations would result in the avoidance of or lessening of significant impacts.

The location of the property, with surrounding vacant land and commercial and industrial uses in proximity to the I-10 freeway (I-10), a major commerce corridor, provides a unique location for the proposed use. In addition, the property owner does not own or control any other suitable properties in the area, and was unable to identify an alternative location that is available for purchase and that

would substantially reduce any of the significant impacts of the proposed project; therefore, the relocation of the proposed project is not considered as a viable alternative.

Additional alternatives considered and rejected include the development of a self-storage facility. This Alternative would result in equal impacts to aesthetics, biological resources, cultural resources, geology and soils, tribal cultural resources, and utilities (sewer, telecommunications), compared to the project since they both would develop the 38-acre site. However, the development of a self-storage facility would reduce trips (traffic) because the operation of a self-storage facility typically includes minimal vehicle trips. This is due to the limited employees required to operate a self-storage facility during operational hours, and the infrequent trips to the facility from clients visiting their storage area. As a result of the reduced traffic trips associated with the self-storage facility, air quality, energy (petroleum consumption), greenhouse gas emissions, and (traffic-related) noise are also likely to be reduced. Although self-storage facilities are allowed within M-2 zones, this alternative was rejected because of the size of the project site. The 38-acre site would be too large for a standard self-storage facility, which typically occupies up to 10 acres. For example, the self-storage facility south of the project sits on an approximately 5-acre site. Additionally, the self-storage facility would not satisfy the objectives to develop a well-maintained state-of-the-art industrial fulfillment center in the Industrial land use area in Palm Springs that is consistent in use and look with the existing developments in the surrounding area, and would not provide employment opportunity and growth in the City's Industrial land use designation because these facilities do not typically require a large number of employees.

Another alternative considered and rejected was the development of a solar farm or wind energy convection system. This alternative would result in equal impacts to aesthetics, cultural resources, geology and soils, tribal cultural resources, compared to the project since they both would develop the 38-acre site. These uses would reduce trips (traffic) due to the limited employees required during operation. As a result of the reduced traffic trips associated with the storage facility, air quality, energy (petroleum consumption), greenhouse gas emissions, and (traffic-related) noise are also likely to be reduced. Impacts to energy resources (i.e., electricity and natural gas) and utilities (sewer, water, energy, natural gas, and telecommunications) would be reduced with the development of the solar farm or WECS, because these facilities do not require onsite buildings that consume energy (indoor lighting, etc.) or water (i.e., bathrooms/faucets) or generate wastewater. However, impacts to biological resources could be increased with the development of a wind or solar farm, because of their operational impacts to birds that fly over or into these facilities. Additional mitigation measures would be required to reduce impacts to flying/migratory species. This alternative was rejected because the City does not allow these uses along a major thoroughfare, including Indian Canyon Drive. Additionally, the solar farm or WECS facility would not develop a well-maintained state-of-the-art industrial fulfillment center, or any substantial employment opportunity and growth in the City's Industrial land use designation.

7.5 Alternatives Evaluated in Detail

The following alternatives were selected for evaluation in this Draft EIR:

1. Alternative 1 – No Project

The project site, under this Alternative, would remain in its current condition as a vacant and undeveloped lot. No development would occur at the site. The existing visual character and visual resources would remain the same, and none of the impacts of the project would occur.

2. Alternative 2 – Reduced Intensity

Under this Alternative, the project would develop a reduced intensity industrial project. Alternative 2 would reduce the size of the industrial building by half. Therefore, this Alternative would reduce the building footprint by 50 percent, for a maximum of 369,680 square feet. This Alternative would reduce the number of employees thus reducing the traffic generated from this Alternative. The Alternative would require a Major Development Permit approval, similar to the proposed project. This Alternative would reduce impacts by approximately half, due to the reduced building intensity, resulting in reduced employees and traffic, therefore, reducing greenhouse gas emissions to less than significant levels.

3. Alternative 3 – Industrial Business Park

Under this Alternative, a mixed use multi-building project with uses consistent with the M-2 Zoning District, would be built as a typical industrial business park. According to Section 92.17.1.01 of the Palm Springs Municipal Code uses permitted within M-2 zones could include adult oriented business; animal day care; animal hospitals, including kennels; cannabis lounge or dispensary; fabrication (i.e., manufactured housing, fencing, cans and containers, vehicle parts); manufacturing (i.e., compounding processing, packaging or treatment of products, saw and planing mills, stone cutting and related activities); cannabis transportation and distribution facility; equipment sales, rental and storage; and wholesale, warehouse, distribution, fulfillment, and import/export centers. Alternative 3 proposes to develop a 182,000-square-foot storage facility on 7-acres, a 26,000-square-foot vehicle storage and rental facility (i.e., U-Haul) on 1 acre, two 26,000-square-foot manufacturing buildings (i.e., stone cutting, lighting and wiring) on 2 acres, two 26,000-square-foot buildings for equipment sales on 2 acres, and two 274,000-square-foot wholesale, warehouse, distribution, fulfillment, and import/export centers on 21 acres. It is estimated that open space areas for retention, irrigation ditches and landscaping would take up 5 acres of the project site. The buildings proposed in Alternative 3 would conform to the Municipal Code, Section 92.17.1 for setbacks, heights, parking, etc. Access to the site would be at similar locations as the proposed project (i.e., one on 19th Avenue for truck access, and two on Indian Canyon Drive for non-truck access). The uses are summarized in the table below.

Table 7-1 Alternative 3 Land Use Summary

Use	Acres	Building Area (Square Feet)
Storage Facility	7	182,000
Vehicle Rental and Storage	1	26,000
Manufacturing Use Building 1	1	26,000
Manufacturing Use Building 2	1	26,000
Equipment Sales Building 1	1	26,000
Equipment Sales Building 2	1	26,000
Warehouse/Distribution/ Fulfillment 1	10.5	274,000
Warehouse/Distribution/ Fulfillment 2	10.5	274,000
Landscape	5	--
Total	38	860,000

Evaluation of Alternatives

A comparison of the impacts of the project and the alternatives selected for further evaluation is provided in this section for each of the environmental topics addressed in the Draft EIR.

Pursuant to the CEQA Guidelines, the discussion of the environmental effects of the alternatives in an EIR may be less detailed than provided for in the project but should be sufficiently detailed to allow meaningful evaluation, analysis, and comparison with the project.

The comparative analysis was conducted qualitatively and, for some resources areas, quantitatively using the existing technical analysis prepared for the project, including the Air Quality Impact Analysis (AQIA), Greenhouse Gas Analysis (GHGA), Noise Study, Traffic Impact Analysis (TIA), and VMT Evaluation. Air quality, greenhouse gas, and traffic/VMT, utility and service impacts were quantitatively analyzed utilizing estimated percentage increases or decreases in impacts when compared to the proposed project. Increases or decreases with respect to greenhouse gases and air quality were based primarily on traffic trips generated which roughly correspond with the number of operational users of the Alternatives. Though noise and VMT do not directly correlate with traffic trips, they would be expected to be reduced compared with the proposed project. The findings within the Biological Resources Report, Cultural Report, and Water Supply Assessment were also used as a baseline for the comparative analysis when determining the impacts to development footprint in the project area.

7.5.1 Alternative 1 – No Project

According to CEQA Guidelines Section 15126.6 (e) the analysis of alternatives must include the “No Project” Alternative. The purpose of describing and analyzing a No Project alternative is to allow decision makers to compare the impacts of approving the proposed project with the impacts of not approving the proposed project. Under the No Project Alternative (“Alternative 1”), the project would

remain in its current condition as a vacant and undeveloped lot. The existing visual character and visual resources would remain the same, and none of the significant impacts of the project would occur. A comparative analysis of impacts for Alternative 1 is provided below:

Aesthetics

Under the No Project Alternative, the visual character of the project site, which is currently vacant land, would remain the same. The views of the surrounding distant mountains to the north, south and west would remain unobstructed when viewed from the surrounding public roadways and private properties, since development would not occur onsite. Alternative 1 would not substantially impact the existing scenic vista. Additionally, Alternative 1 would not conflict with applicable zoning and other regulations governing scenic quality because no development would occur onsite. Finally, Alternative 1 would not increase lighting in the area since no development would occur under this Alternative.

Compared to the project, Alternative 1 would result in lower impacts to aesthetic resources, such as scenic vistas, scenic quality, and light and glare, since Alternative 1 would not result in development of the project site. Neither Alternative 1 nor the proposed project would result in significant impacts.

Air Quality

Under Alternative 1, no land development disturbance, construction or operation would occur on the property, resulting in no air emissions. Alternative 1 would not conflict with or obstruct implementation of the applicable air quality plan. However, as a vacant site located within the SCAQMD designated Blowsand Zone, the site would continue to be exposed to seasonal winds with potential off-site dust deposition and wind erosion capable of resulting in particulate matter emissions (PM10 and PM2.5) under adverse wind conditions. Dust and sand from the site during strong or adverse wind events would continue unregulated, similar to other natural local sources of particulate matter emissions within the Blowsand Zone. Occurrences of unauthorized human-driven activities on the undeveloped project site, such as unpaved road travel or parking, would be subject to City and SCAQMD nuisance regulations and enforcement, if they were to occur. Alternative 1 would result in no construction or operational pollutant emissions and therefore would not contribute to a cumulatively considerable net increase of any criteria pollutant. Other than unregulated wind erosion and associated particulate matter emissions, Alternative 1 would not expose sensitive receptors to substantial pollutant concentrations or odors because the site would remain undeveloped. Therefore, Alternative 1 would result in no impacts to air quality.

By comparison, the proposed project was found to result in less than significant impacts on all air quality threshold criteria, including air quality plan conformance and the quantified emission levels compared against the SCAQMD Air Quality Significance Thresholds (construction and operations), construction LST, operational LSTs, and health risks. No mitigation was necessary for the proposed project. Alternative 1 would result in lower impacts than the proposed project, Alternative 2, and

Alternative 3; however, none of the alternatives nor the proposed project would result in any significant impacts relating to Air Quality.

Biological Resources

The project site is undeveloped and has been disturbed by off-road vehicle tracks impacting about 5 percent of the terrain. The environment of the site is part of the desert scrub habitat of the valley floor.

Under Alternative 1, the project would remain in its current condition as undeveloped land. Alternative 1 would avoid construction of the project site, and would not result in any impacts to biological resources because the land would not change.

Per the conclusions in **Section 4.3, *Biological Resources***, the development of the proposed project may result in impacts to burrowing owls (*Athene cunicularia*), migrating nesting birds, and the Palm Springs Ground Squirrel (*Spermophilus tereticaudus*). However, these impacts would be mitigated to less than significant levels with the implementation of mitigation measures. Alternative 1 would result in lower impacts than the proposed project; however, neither Alternative 1 nor the proposed project would result in any significant impacts.

Cultural Resources

Under Alternative 1, construction or ground disturbing activities would not occur which would avoid any potential buried archaeological resources and human remains. Therefore, the No Project Alternative would not result in impacts to cultural resources.

Per the conclusions in **Section 4.4, *Cultural Resources***, of this Draft EIR, the project site had not been surveyed for cultural resources prior to the current project-specific report, and no cultural resources had been recorded within the project boundaries. Further, the field study did not identify any cultural resources within the project site. Impacts were found to be less than significant with the implementation of mitigation because the project area may be sensitive for buried archaeological resources, and mitigation was required to monitor excavation and grading activities to reduce those potential impacts. Compared to the proposed project, Alternative 1 would result in lower impacts to than the proposed project; however, neither the Alternative 1 nor the proposed project would result in a significant impacts.

Energy Resources

The consumption of energy would not occur at the project property under Alternative 1 since this Alternative does not propose development. The project site would remain vacant and undeveloped and would result in no impacts to energy resources. Compared to the proposed project, which was determined to have less than significant impacts, the No Project Alternative would result in reduced impacts to energy resources. The proposed project and Alternative 1 would not result in significant impacts to energy resources.

Geology and Soils

The project site is currently undeveloped and would remain in the same condition under Alternative 1. Alternative 1 would not result in the development of habitable structures onsite, and no septic systems or alternative wastewater disposal systems would occur with Alternative 1. No impacts related to loss of topsoil, sedimentation, erosion, and landform alterations associated with construction would occur with the No Project Alternative. Compared to Alternative 1, the proposed project would result in increased impacts to geology and soils because it would place structures and people in a seismically active area; however, these impacts are mitigable to less than significant levels. Alternative 1 would result in lower impacts than the proposed project; however, neither Alternative 1 nor the proposed project would result in any significant impacts.

Greenhouse Gas Emissions

Alternative 1 would result in no measurable greenhouse gas emissions since no development would occur on the property. Moreover, Alternative 1 would not conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases. By comparison, the proposed project was found to result in potentially significant and unavoidable impacts from quantitative GHG emissions and plan conformance. GHG impacts under Alternative 1 would be lower than the proposed project, and would not result in the project's significant and unavoidable impacts.

Hazards and Hazardous Materials

Alternative 1 would not introduce, use, store, or dispose of any potentially new hazardous materials because no development would occur.

There would be no uses onsite that would potentially create a hazardous risk to the public or environment or any activities that would inhibit any established hazard evacuation plan.

The proposed project would implement safety procedures when using, handling, or storing hazardous materials to ensure less than significant impacts. Compared to the proposed project, impacts to hazards and hazardous materials would be reduced in Alternative 1, but neither would cause a significant impact.

Hydrology and Water Quality

Under Alternative 1, the subject property would maintain its current undeveloped condition without incurring any physical changes, resulting in no impacts to any hydrology and water quality thresholds. As an undeveloped site, localized and minor instances of naturally occurring erosion and siltation in response to moderate to large storm events would continue unaltered because the well-drained soils and flat terrain would limit potential for these impacts.

The proposed project was found to result in less than significant impacts on all thresholds and criteria for hydrology, without the need for mitigation because the various compliance plans and supporting

documents required to implement the proposed project, including a SWPPP, WQMP, Hydrology Report, and underlying preliminary engineering design compliant of the City's stormwater retention parameters are required for all projects. Hydrology and water quality impacts under Alternative 1 would be lower than the proposed project, Alternative 2, and Alternative 3, but impacts are less than significant under all alternatives.

Noise

The project site is currently vacant and undeveloped. In its existing condition, the property does not contribute to the existing ambient noise environment in the surrounding area. The existing noise environment includes vehicles driving along Indian Canyon Drive and 19th Avenue, immediately east and south of the project, respectively. Therefore, this Alternative would not degrade the noise environment or result in an increase in groundborne vibration to significant levels.

Construction and operational noise under the proposed project are not anticipated to result in significant impacts, with the implementation of mitigation measures. However, compared to the proposed project, the No Project Alternative would not produce noise or vibration impacts.

Population and Housing

Under Alternative 1, the project site would not introduce unplanned growth in the City because development would not occur on the 38-acre site. Alternative 1 and the proposed project would not result in the development of residential homes. Therefore, neither would result in an increase in housing growth in Palm Springs. However, the proposed project would result in growth in employment and population as a result of employees relocating from outside the City. However, as discussed in **Section 4.11, *Population and Housing,*** this increase is not unplanned, and impacts will be less than significant. Alternative 1 would result in no impacts to unplanned growth in the City because no development would occur onsite.

Public Services

Under Alternative 1, the project site would not introduce employees, or uses that would place additional burden on the City of Palm Spring's public services. There would not be an increased demand in police, fire, and emergency services, or schools, public facilities, and parks. Alternative 1 would result in no impacts to public services.

The proposed project's anticipated growth in employment and population from employees relocating from outside the City is both planned and expected. Therefore, impacts on public services are anticipated to be less than significant. The proposed project would be subject to review by the fire and police departments to ensure access and other safety measures are implemented at the site. Compared to the proposed project, Alternative 1 would result in reduced impacts to public services. Neither scenario would result in significant impacts.

Transportation

The property is currently vacant. Alternative 1 would not result in any increase in traffic since Alternative 1 does not propose development on the property.

Compared to the proposed project, Alternative 1 would result in lower impacts since the Alternative would remain vacant. Alternative 1 would not contribute to Vehicle Miles Traveled (VMT) in the area. The proposed project has a significant and unavoidable impact relative to VMT Service Population estimates for baseline and cumulative conditions. Alternative 1 would not result in any significant impacts.

Tribal Cultural Resources

As discussed in **Section 4.14, *Tribal Cultural Resources***, the Sacred Lands File search by the NAHC produced negative results for Native American cultural resources in the general vicinity. However, because of the prehistoric artifacts previously documented in the records search area, the project area may be sensitive for buried archaeological resources. The project was determined to be less than significant with mitigation which includes construction monitoring. Under Alternative 1, no construction or ground disturbing activities would occur and therefore, no impacts on Tribal cultural resources would occur. The level of impact under this Alternative 1 would be lower than the proposed project.

Utilities and Service Systems

The project site is vacant and undeveloped land. The site would remain in the same condition under Alternative 1 and would result in no impacts to water service and supply, wastewater collection and treatment, solid waste, energy, and natural gas and telecommunications. Since the Alternative does not propose development of the project site, this Alternative would result in lower impacts to utilities compared to the proposed project. However, neither scenario would have a significant impact on these systems.

7.5.2 Alternative 2 – Reduced Intensity

Under this Alternative, the project would develop a reduced intensity industrial project. Alternative 2 would reduce the size of the industrial building by half. Therefore, this Alternative would reduce the building footprint to a maximum of 369,680 square feet. This Alternative would reduce the number of employees thus reducing the traffic generated from this Alternative. The Alternative would require a Major Development Permit approval, similar to the proposed project.

Aesthetics

Under the Reduced Intensity Alternative, impacts to the surrounding scenic vistas and scenic quality would occur but would be reduced because this Alternative would develop a reduced building footprint.

Like the proposed project, the Reduced Intensity Alternative would impact existing scenic vistas to the north, west, and south of the project. When viewed on the public rights-of-way (Indian Canyon Drive to the east and 19th Avenue to the south) the distant mountains to the southwest, west, northwest, and north are unobstructed by the property due to its undeveloped character. The reduced building size would allow motorists and pedestrians to see more of the scenic vistas to the southwest, west, northwest, and north when viewed from the public rights-of-way because the building would be less of an obstruction. Thus, impacts would be somewhat reduced.

Design features of the Reduced Intensity Alternative, including architecture, landscaping, and development standards are all required to adhere to the design guidelines established for the proposed project, and would be implemented under this alternative. Therefore, Alternative 2 would result in similar impacts to scenic quality compared to the proposed project, insofar as complying with architecture, landscaping, and development standards (i.e., building height requirements, lot size requirements) design as outlined in the Palm Springs Municipal Code Section 92.17.1.03. As determined in **Section 4.1, *Aesthetics,*** the project would have less than significant impacts to scenic quality, because the architecture, site plan and landscaping are all required to adhere to Section 92.17.1.03 of the Municipal Code.

The Reduced Intensity Alternative would result in reduced impacts to light and glare, compared to the proposed project. Both Alternative 2 and the proposed project would result in the development and operation of a fulfillment center. However, Alternative 2 would result in the development of half of the building size, thus, reducing the amount of required parking by half. Light fixtures to illuminate the parking area would still be required, like the proposed project, however, the number of light poles and fixtures will be reduced compared to the project. Lighting for landscaping will still be required throughout the project. Overall, Alternative 2 would result in similar illumination onsite for security reasons, and to provide lighting for employees walking to their vehicles, signage lighting, building entrance lighting, and landscape lighting. Therefore, Alternative 2 and the proposed project would result in similar lighting impacts. However, as described in **Section 4.1**, the photometrics prepared for project lighting showed that the light generated from the project's lighting would not significantly impact the surrounding properties. Both Alternative 2 and the proposed project are required to comply with Section 93.21.00 of the Palm Spring Municipal Code governing outdoor lighting.

The Reduced Intensity Alternative would result in reduced impacts to aesthetics compared to the proposed project. However, as determined in **Section 4.1, *Aesthetics***, impacts to aesthetic resources are less than significant for the proposed project and do not require the implementation of mitigation measures. Impacts associated with views of scenic vistas, scenic quality, and light and glare would be less than significant under both Alternative 2 and the proposed project.

Air Quality

Construction duration is an indicator of short-term pollutant emissions. Although air quality emission increases or decreases are not linear, a considerably smaller building and facility construction under Alternative 2 would result in a logically shorter period of construction-related pollutant emissions than those estimated for the proposed project. Size-driven construction duration factors programmed into CalEEMod from SCAQMD Construction Survey data were used to estimate the building construction period of Alternative 2. Those factors indicate that the reduced building area for Alternative 2 would occur over an estimated duration of 230 days, approximately 57 days shorter (20 percent lower) than the duration of approximately 287 days estimated for construction of the proposed project. If the site preparation, grading, paving and architectural coating phases are equal to the proposed project, Alternative 2 would have a total duration of approximately 410 days, compared to 467 days estimated for the proposed project. The 57-day difference (reduction) in building construction duration under Alternative 2 would represent an overall reduction of approximately 12 percent for the combined phases of construction. The smaller building scope would entail the operation of fewer pieces of construction equipment and for relatively shorter durations, as well as a lesser extent of building architectural coatings. The area of disturbance under Alternative 2 and the proposed project would be equivalent. Based on the reduced building construction scope and using the analysis performed for the proposed project as a reference, Alternative 2 would result in less than significant impacts on the implementation of the applicable air quality plan (AQMP 2022) based on the compatibility with the land use and growth factors. The shorter duration of construction, operational and localized emissions from the reduced scope would also result in less than significant impacts on criteria pollutants (PM10 and Ozone/precursors) for which the project region is in non-attainment under federal or state ambient air quality standard. Project-related emission levels would be small enough that their impact may not be detected in the regional models that are currently used to determine ambient air quality levels for health-related purposes. Localized construction and operational emissions associated health risks and other sources of emissions, including odors, would also be less than significant in relation to sensitive receptors, the nearest of which is a residence located at 17725 Covey Street, approximately 2,054 feet to the northeast of the project site. The temporary construction activity and operation of heavy-duty diesel trucks accessing the site under Alternative 2 would result in short-term and operational toxic air contaminants (TAC) from diesel particulate matter (DPM). The relatively shorter construction duration and the smaller building capacity associated with Alternative 2 would result in lower levels of TACs and therefore reduce incremental cancer and non-cancer risk attributable to construction-source project DPM emissions, particularly in relation to the nearest sensitive receptors located over 2,000 feet from the project site. Similar findings are expected for operational DPM emissions on the three types of receptors: residents in the area, workers near the project, and school children, given the smaller building and operational capacity.

By comparison, the proposed project was found to result in less than significant impacts on all air quality threshold criteria, including air quality plan conformance and the quantitative emission levels

compared against the SCAQMD Air Quality Significance Thresholds (construction and operations), construction LST, operational LSTs, and health risk levels. Less than significant impacts for the proposed project were also found pertaining to the exposure of sensitive receptors to substantial pollutant concentrations and other emissions (such as those leading to odors).

Based on the trip generation analysis provided in the *N. Indian Canyon/19th Ave. High-Cube Warehouse, Project Alternatives* (**Appendix N**), operation of Alternative 2 would result in approximately 1,068 passenger car equivalent trips, representing approximately 50% of the 2,134 daily trips associated with the proposed project, and associated use of fossil fuels. Alternative 2 would also be expected to consume less electricity from operations (see Energy section below). Given that mobile emission sources attributed to vehicle trips and area emission sources attributed to energy uses are a majority of operational criteria air emissions, emission impacts from Alternative 2 would be lower than the proposed project and would not be expected to exceed the SCAMQD Air Quality Significance Thresholds and would translate to less than significant impacts.

No mitigation was deemed necessary for the proposed project because of the less than significant findings, and none would be required for Alternative 2. Therefore, Alternative 2 and the proposed project would both result in less than significant impacts, but Alternative 2 would reduce overall emissions when compared to the proposed project.

Biological Resources

Under Alternative 2, impacts to biological resources would be the same compared to the proposed project, because the entire project site would be graded and disturbed.

As established in **Section 4.3, *Biological Resources***, the development of the proposed project may result in impacts to burrowing owls (*Athene cunicularia*), migrating nesting birds, and the Palm Springs Ground Squirrel (*Spermophilus tereticaudus*). However, these impacts would be mitigated to less than significant levels with the implementation of the same measures as the proposed project: **Mitigation Measure BIO-1*,* Mitigation Measure BIO-2,** and **Mitigation Measure BIO-3. Mitigation Measure BIO-1** requires the project applicant to pay the Local Development Mitigation Fee (LDMF) required by the CVMSHCP to mitigate impacts to species covered under the Plan, including the Palm Springs Ground Squirrel. **Mitigation Measure BIO-2** requires a nesting bird survey to occur if any grading or site disturbance occurs between February 1st and August 31st to protect nesting birds **Mitigation Measure BIO-3** requires two burrowing owl surveys prior to construction to assure none of the species occurs on-site.

Since Alternative 2 would develop the same area on the project site, impacts to biological resources would not change. Both projects would be required to implement **Mitigation Measure BIO-1** through **Mitigation Measure BIO-3** to reduce potential impacts to less than significant levels. Neither Alternative 2 nor the proposed project result in any significant impacts to biological resources.

Cultural Resources

Alternative 2 would fully develop the entire project site with a warehouse, as would the proposed project. This Alternative would have identical impacts to previously unknown cultural resources or human remains which could be uncovered during grading, construction, and any other ground disturbance activities. Therefore, impacts would be comparable to the proposed project, and this Alternative would still need to implement **Mitigation Measure CUL-1** which calls for cultural and tribal monitoring during ground disturbing activities to reduce impacts to potential sensitive cultural resources to less than significant levels. Therefore, Alternative 2 would not avoid or substantially lessen any significant impacts to cultural resources that would not also occur with the proposed project.

Energy

Development and operation of the Reduced Intensity Alternative would result in an increase of energy consumption compared to the site's existing conditions, however, it would also result in reduced energy consumption compared to the proposed project.

Construction

Short-term energy consumption related to construction activities would occur during development of Alternative 2. Construction-related energy use would include the consumption of electricity for tools and power required for constriction trailers. Petroleum fuels, such as gasoline and diesel, would also be required during construction for the operation of machinery, large equipment, and employee vehicle and truck/vendor trips.

Compared to the project, Alternative 2 proposes to reduce the building square footage from 739,360 square feet to 369,680 square feet (by half). Although Alternative 2 would develop the entire 38-acre site, the reduced building size would result in decreased construction duration compared to the proposed project. The reduced building area for Alternative 2 would occur over an estimated duration of 230 days, approximately 57 days shorter (20 percent lower) than the duration of approximately 287 estimated for the construction of the proposed project. If the site preparation, grading, paving and architectural coating phases are equal to the proposed project, Alternative 2 would have a total duration of approximately 410 days, compared to 467 days estimated for the proposed project. The 57-day difference (reduction) in building construction duration under Alternative 2 would represent an overall reduction of approximately 12 percent for the combined phases of construction. Therefore, the reduced construction duration would result in reduced energy consumed during construction of the site.

As demonstrated in **Section 4.5, *Energy Resources***, the use of electricity and petroleum during construction of the proposed project would not be inefficient, wasteful or unnecessary because construction activities would be required to implement CARB regulations aimed at cleaning up off-

road construction equipment and related fuel efficiencies, and regulations reducing the idling of heavy-duty motor vehicles. Additionally, construction-related energy consumption at the site would cease at the conclusion of construction. Neither Alternative 2 nor the proposed project would result in significant impacts to energy resources during construction of the site.

Operation

The operation of the 38-acre site would result in an increase in energy demand for electricity and petroleum compared to existing conditions. Alternative 2 proposes a reduced building footprint, therefore, Alternative 2 would result in reduced consumption of energy during operation of the site. Therefore, Alternative 2 would consume 50 percent less electricity than the proposed project annually. As determined in **Section 4.5**, the proposed project would consume 3,673,072 kWh of electricity annually. Therefore, Alternative 2 would be expected to consume approximately 1,836,536 kWh of electricity annually. \Additionally, Alternative 2 would generate approximately half of the anticipated daily trips (1,068 daily trips compared to the project's 2,134 daily trips) and consume half of the anticipated petroleum (431,155.5 gallons) during operation. Consistent with the analysis in **Section 4.5**, the use of electricity and petroleum fuel during operation of Alternative 2 would not be excessive, wasteful, or unnecessary because the proposed project will be designed and constructed in accordance with the City's latest adopted energy efficiency standards, which are based on the California Title 24 energy efficiency standards and based on this Alternative's estimated annual electrical consumption of 1,836,536 kWh, this alternative would account for approximately .0014 percent of SCE's total estimated demand in 2030. Additionally, the use of petroleum fuel during operation of Alternative 2 would not be excessive, wasteful, or unnecessary because operation of the project is expected to use decreasing amounts of petroleum over time due to enhanced fuel economies realized pursuant to federal and State regulatory actions. Moreover, as indicated in **Section 4.5,** related transition of vehicles to alternative energy sources would likely decrease future gasoline fuel demands per mile driven.

The construction and operation of both the Reduced Intensity Alternative and the proposed project would result in an increase of energy demand in the area. However, Alternative 2 would result in less consumption of energy resources during construction and operation, due to the reduced building area. Alternative 2 would, like the proposed project, have less than significant impacts on energy resources.

Neither the proposed project nor Alternative 2 would result in significant impacts regarding energy resources.

Geology and Soils

The project site is currently undeveloped. Under Alternative 2, the industrial building would be reduced compared to the proposed project, to a maximum of 369,680 square feet.

As determined in **Section 4.6, *Geology and Soils,*** the site is not located in or near an Alquist-Priolo Earthquake fault zone. To mitigate impacts from seismic events, structures proposed in Alternative 2 would be required to be developed to the most current state and local standards regarding building construction. The project site is not located near a slope, and landslides would not occur at the site. Therefore, the structure would not be impacted by rockslides or landslides. No septic systems are proposed, and this Alternative would extend the same sanitary sewer pipe to the site in the same location as the proposed project. The potential for impacts related to loss of topsoil, sedimentation, erosion, and landform alterations associated with Alternative 2 would be the same compared to the proposed project, because Alternative 2 would develop the entire project site, and would be required to implement the same standard requirements, including the most current seismic design coefficients and ground motion parameters and all applicable provisions of the 2022 CBC, specifically Chapter 16 of the CBC, *Structural Design,* Section 1613, *Earthquake Loads*, as well as Title 8, *Buildings and Construction*, of the City Municipal Code.

Similar to the proposed project, development of Alternative 2 would be required to implement the mitigation measures established in the project-specific Geotechnical Evaluation (**Appendix G**). **Measure GEO-1** through **Mitigation Measure GEO-11** would be required to ensure that the project comply with all grading and excavation codes of the City as well as clearing, excavation, re-compaction, grading, footings, floor slabs, and all other requirements set forth in the Geotechnical Investigation.

Additionally, during construction, the site would be required to have a paleontological monitor onsite if excavations exceed 10 feet, as provided in **GEO-12** and **GEO-13**, to ensure impacts to paleontological resources are less than significant.

These mitigation measures would apply equally to Alternative 2's impacts and reduce them to less than significant levels. Alternative 2 would result in similar impacts to geology and soils compared to the proposed project.

Greenhouse Gas Emissions

The smaller scope of building construction under Alternative 2 would result in a shorter period of the overall construction activities by approximately 57 days or 12 percent, as a source of GHG emissions, than the proposed project. The smaller building scope would also entail the operation of fewer pieces of construction equipment for shorter durations and a lesser extent of building architectural coatings.

Operation of Alternative 2 would result in approximately 1,068 passenger car equivalent trips, representing approximately 50% of the 2,134 daily trips associated with the proposed project. Alternative 2 would also be expected to consume less electricity from operations (see Energy section above). Given that mobile emission sources attributed to vehicle trips and area emission sources attributed to energy uses are a majority of operational GHG emissions, impacts to GHG emissions from Alternative 2 would be lower, but the scale of this reduction may not lead to direct or indirect

GHG emissions lower than the screening levels. In such case, the project may result in significant and unavoidable GHG impacts if feasible mitigation is not available to reduce direct or indirect emissions. A reduced scope under Alternative 2 would entail construction and operation in accordance with the latest energy efficiency standards and lower mobile-source emissions from reduced trips, which would facilitate consistency with the applicable plans, policies or regulations adopted for the purpose of reducing the emissions of greenhouse gases, including the 2022 Scoping Plan and County of Riverside CAP because it would incorporate insulation, windows, air filtration, heating/cooling systems, lighting, appliances, water efficiency, and other features applicable to commercial/industrial land uses. On the matter of GHG emissions, Alternative 2 impacts would be lower than the proposed project, but potentially significant. By comparison, the proposed project was found to result in potentially significant and unavoidable impacts from quantitative GHG emissions and pertaining to plan conformance. Therefore, on the matter of plan conformance, Alternative 2 impacts would be equivalent to the proposed project.

Hazards and Hazardous Materials

Construction

Similar to the proposed project, construction of Alternative 2 is expected to involve the temporary management and use of oils, fuels and other potentially flammable substances in a manner similar to the proposed project. Hazardous materials would be delivered, stored, and handled consistent with manufacturer instructions and local, State and federal requirements. The nature and quantities of these products would be limited to what is necessary to carry out construction of Alternative 2 and are not anticipated to create significant impacts due to the limited quantities used in construction and the timeline of construction, which would occur in one phase. Additionally, the contractor will be required to identify a controlled staging area within the project limits for storing materials and equipment, as required by a Storm Water Pollution Prevention Plan (SWPPP)in compliance with the requirements of the Construction General Permit (CGP) Colorado River Basin Regional Water Quality Control Board (RWQCB), like the proposed project. Similar to the proposed project, the Reduced Intensity Alternative would implement safety procedures when using, handling, or storing hazardous materials and impacts would be less than significant.

Operation

Operation of Alternative 2 could involve the use of materials common to commercial or industrial developments that are labeled hazardous (e.g., solvents and commercial cleaners, petroleum products, and pesticides, fertilizers, and other landscape maintenance materials). Manufacturing and other chemical processing would not occur within the project, but manufacturing could occur in the future.

Similar to the proposed project, if Alternative 2 were to store hazardous materials in large quantities, the applicant would be required to submit a Hazardous Materials Business Plan (HMBP) to the Riverside County Department of Environmental Health (DEH) and Fire Department. The Riverside County DEH, as the Certified Unified Program Agency (CUPA) for the County, would manage and assure implementation of a project-specific HMBP.

Any tenant, whether a high cube warehouse or another industrial use, and all their employees would be required to comply with Occupational Safety and Health Administration (OSHA)regulations and standards. The Reduced Intensity Alternative would implement safety procedures when using, handling, storing hazardous materials and impacts would be less than significant.

The Alternative 2 and the project proposes no changes to the City's roadway network. Gated access to site project would not limit access to authorized personnel, trucks, and emergency vehicles. Vehicles accessing the street from the project would not interfere with evacuation routes or plans, insofar as Alternative 2 would not alter any existing street used for these purposes. Access points would be reviewed by the Fire Department, to ensure adequate access for emergency vehicles. Implementation of Alternative 2 is not expected to interfere with the critical facilities, emergency transportation and circulation, or emergency preparedness coordination, similar to the proposed project. Alternative 2 would be reviewed by City staff and police and fire department officials to ensure adequate police and fire service and safety as a result of implementation, similar to the proposed project.

Overall, the Reduced Density Alternative would result in similar impacts to hazards and hazardous materials, as compared to the proposed project, and both would be less than significant.

Hydrology and Water Quality

Alternative 2 and the proposed project would involve the same area of disturbance, approximately 38 acres. During construction and life of the project, similar to the proposed project, Alternative 2 would be required to implement the various compliance plans under the Clean Water Act, National Pollutant Discharge Elimination System (NPDES), state, and local regulations to prevent violations or impacts to surface water quality standards and waste discharge requirements pertinent to surface or ground water quality.

Implementation of a Stormwater Pollution Prevention Plan (SWPPP) would be required for the entire site during the period of construction to comply with the most current NPDES General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities. During the life of the project, water quality standards and waste discharge requirements would be met and demonstrated through a project-specific Water Quality Management Plan (WQMP). The on-site retention requirements for Alternative 2 would be the same as for the proposed project, and based on flows generated.

On the aspect of water demand in relation to groundwater supplies, Alternative 2 would involve a 50% reduction in demand for water than what was found in the WSA/WSV for the proposed project. Given that the WSA for the proposed project demonstrated sufficient supply, Alternative 2 would also benefit from sufficient water supply, since it will be half the size. Alternative 2 would be subject to the locally adopted water-efficient landscape ordinance.

Alternative 2 would implement the standard requirements for non-structural and structural pollution source control measures that work toward the protection of groundwater quality. These measures would be privately maintained during the life of the Alternative 2 project.

On the aspect of groundwater recharge, Alternative 2 will not result in any physical modifications to an existing recharge facility or result in any stormwater runoff condition capable of interfering with recharge operation. The City's requirement for on-site retention facilities would contribute to infiltration and groundwater recharge.

On the matter of erosion, siltation, flooding, and urban runoff conditions, Alternative 2 would result in an increase in impervious land cover through the introduction of structures, hardscape and streets. However, the proposed storm drainage system with required on-site retention facilities and stabilized surfaces would control the volume and conveyance of runoff to prevent erosion and siltation. Flooding would be prevented through compliance with the City's engineering standards for new development. Since Alternative 2 is required to retain urban runoff on-site, it would not result in a discharge condition affecting public storm drainage infrastructure.

By comparison, the proposed project was found to result in less than significant impacts on all thresholds and criteria for hydrology, without the need for mitigation. Other than the standard plans, no mitigation was necessary to achieve less than significant impacts.

Although Alternative 2 would be expected to result in lesser impacts to hydrology and water quality, both Alternative 2 and the proposed project would involve less than significant impacts.

Noise

The Reduced Intensity Alternative would result in the development and operation of the 38-acre site, resulting in an increase in the noise environment compared to the existing conditions.

Construction

The Reduced Intensity Alternative proposes the construction and operation of a 369,680-square-foot fulfillment center on approximately 38 acres. Similar to the proposed project, construction of Alternative 2 would increase the ambient noise level because the site would be developed. However, as demonstrated in **Section 4.10**, ***Noise***, construction of the site would not result in noise levels exceeding City standards. Therefore, since Alternative 2 proposes a reduced building area (approximately half), the Reduced Intensity Alternative would also result in less than significant noise levels during construction.

Similar to the proposed project, Alternative 2 would not generate significant groundborne vibration. As determined in **Section 4.10**, at distances ranging from 2,054 to 3,327 feet from primary construction activities, surrounding sensitive receptors would experience construction vibration velocity levels less than 0.01 PPV (in/sec) and will not exceed City of Palm Springs vibration threshold of 0.30 PPV (in/sec) at any sensitive receiver location. The construction vibration analysis shows that the unmitigated project-related vibration impacts will be less than significant during the construction activities at the project. Since Alternative 2 would be developed on the same 38-acre property located 2,054 to 3,327 feet from sensitive receptors, neither the proposed project nor Alternative 2 would result in significant impacts to noise or vibration during construction.

Operation

Operational noise associated with project-generated traffic would be less under Alternative 2 and is not anticipated to be significant. Alternative 2 would include the operation of a 369,680-square-foot fulfillment center. As demonstrated in **Section 4.10**, the closest noise sensitive receiver is a residential structure approximately 2,054 feet north of the project boundary. The operation of the proposed project would not result in increased noise impacts that would be significant to the residential structure. Alternative 2 would develop half of the building area. Therefore, the Reduced Intensity Alternative would reduce noise compared to the proposed project because there would be fewer trucks accessing and maneuvering through the site, a reduced need for equipment (i.e., HVAC, forklifts, etc.), and less employee vehicle traffic accessing the site. However, both the proposed project and Reduced Intensity Alternative would result in less than significant impacts.

Operational noise and groundborne vibration from the Reduced Intensity Alternative will not be significant. Trucks accessing the site would be reduced by approximately half, due to the reduced building area, and, as determined in **Section 4.10,** truck traffic will likely not pass sensitive receptors (to the north), since they would travel to and from the Interstate 10 freeway (to the south). Groundborne vibrations from truck traffic would not be significant.

Overall, the Reduced Density Alternative 2 would result in reduced noise and vibration impacts, as compared to the proposed project, but both would be less than significant.

Population and Housing

The subject property is currently vacant and is located in an area zoned for manufacturing and industrial operations. As discussed throughout this DEIR, the proposed project would provide 718 jobs during operation of the fulfillment center. **Section 4.11, *Population and Housing,*** determined that the project would not result in significant impacts to unplanned population, housing, or employment growth because the City of Palm Springs and SCAG anticipate this growth in their growth forecasts, which is primarily based on the General Plan. Alternative 2 proposed a reduction in building area by approximately half, which would result in reduced employment. A 50 percent employment reduction would result in 359 employees. According to the 2023 Updated Land Use Element, the City

of Palm Springs includes enough capacity for employment to increase from approximately 28,000 jobs in 2020 to almost 60,000 jobs at build out. Additionally, the City estimates 11,638,620 square feet of industrial development to occur during City buildout. Alternative 2's addition of 359 employees and a 369,680-square-foot industrial building would not cause an exceedance of the City's employment or growth projections.

The operation of Alternative 2 would result in approximately 359 employees, which could result in the need for housing for employees within the City, for employees relocating to the City. However, as stated in **Section 4.11**, future employees would likely be existing residents of Palm Springs or other cities within the Coachella Valley. The City of Palm Springs has a 10 percent vacancy rate and proposes 2,557 dwelling units within the City between 2021 to 2029. The vacancy rate and addition of new housing would contribute to housing availability in the City. Additionally, according to the SCAG 6th Cycle Final RHNA Allocation Plan, the nine cities in the Coachella Valley will have a demand for 31,125 housing units by 2029. As housing is developed to meet this housing demand, it will improve housing availability for current and future residents that could move to the Coachella Valley for employment. Therefore, impacts to population, employment, and housing would be less than significant with both the proposed project and Alternative 2.

Both Alternative 2 and the proposed project would require the site's connection to sewer infrastructure. Construction will occur on 19th Avenue from an existing 6-inch sewer line approximately 650 feet east of Indian Canyon Drive in 19th Avenue. As determined in **Section 4.11,** the project's connection to the sewer lines will not result in unplanned growth because the City of Palm Springs and the sewer provider (MSWD) anticipate growth in this area in the General Plan and infrastructure plans. Existing water and electrical utilities occur along the rights-of-way immediately adjacent to the project (i.e., Indian Canyon Drive and 19th Avenue). The proposed project and Alternative 2 would connect to the existing infrastructure. The site's connection to the infrastructure would result in less than significant impacts related to facilitating growth.

Due to Alternative 2's decreased intensity, the Alternative would result in less employment, population, and housing in the City of Palm Springs (and surrounding areas), compared to the proposed project. However, both Alternative 2 and the proposed project would result in less than significant impacts.

Public Services

Similar to the proposed project, the Reduced Intensity Alternative would introduce uses that would place additional demand on the City of Palm Springs' public services. There would be an increased demand in police services, fire and emergency services as a result of the development of Alternative 2. However, like the proposed project, Alternative 2 would be required to comply with applicable policies and codes imposed by the City, and plans would be subject to review by the fire and police departments to ensure access and other safety measures are implemented at the site.

Alternative 2 would result in reduced impacts to public services compared to the proposed project since the Alternative would reduce the intensity of development onsite, including the number of employees. However, both scenarios would result in less than significant impacts.

Transportation

The Reduced Intensity Alternative would result in a decrease in traffic impacts compared to the existing conditions.

Construction

Short-term construction vehicle trip impacts would result from the development of Alternative 2. However, these impacts would be generally limited to permitted construction activity hours. Additionally, construction traffic would cease once construction of the facilities was complete. Roadway improvements and off-site construction would require the preparation and approval of a Traffic Control Plan, to assure safe access during construction.

Primary and secondary access to the site would be expected to occur along Indian Canyon Drive and 19th Avenue.

Alternative 2 operations would result in a decrease of transportation/traffic in the project area by approximately half. Employee numbers for the proposed project (718) are anticipated to be half (359) for Alternative 2. Truck trips for the proposed project were derived utilizing *TUMF High-Cube Warehouse Trip Generation Study* (WSP, January 29, 2019) as referenced in the project traffic study. All trips are represented by the Passenger Car Equivalents (PCE) and estimated to be reduced by half **Table 7-2** illustrates the calculations utilized, and **Table 7-3** compares the trips generated by the proposed project and Alternative 2.

Table 7-2 Trip Generation Rates Passenger Car Equivalents (PCE)[1]

Trip Generation Rates									
Land Use	ITE LU Code	Quantity *(note 2)*	AM Peak Hour[2]			PM Peak Hour[2]			Daily
			In	Out	Total	In	Out	Total	
High Cube Warehouse	-	TSF	0.121	0.039	0.160	0.058	0.149	0.207	2.887

1. *North Indian Canyon & 19th Avenue High-Cube Warehouse Traffic Analysis (Urban Crossroads, March 1, 2023).*
2. *AM/PM peak hour (in/out) splits are estimated from ITE 154 (High-Cube Transload and Short-term Storage Warehouse.*

Table 7-3 Alternative 2 Trip Generation Comparison Passenger Car Equivalents (PCE)[3]

Land Use	AM Peak Hour			PM Peak Hour			Daily
	In	Out	Total	In	Out	Total	
Alternative 2 Trip Generation Comparison							
Proposed Project[1]							
739,630 SF High Cube Fulfilment Center	89	29	118	44	111	155	2,134
Reduced Project – Alt 2[2]							
369,680 SF High Cube Fulfilment Center	45	145	59	21	55	76	1,068
Alternative 2 Delta (Alternative – TS)	**44**	**15**	**59**	**23**	**56**	**79**	**1,066**

1. *North Indian Canyon & 19th Avenue High-Cube Warehouse Traffic Analysis (Urban Crossroads, March 1, 2023).*
2. *N. Indian Canyon/19th Ave. High-Cube Warehouse, Project Alternatives, Traffic Memo (Urban Crossroads, January 18, 2024).*

Operation of Alternative 2 would decrease on- and off-site vehicle trips by approximately half from because the reduced size of the building under this Alternative will generate fewer employee and delivery trips entering and leaving the project site.

Given the projected decrease in vehicle trips generated by Alternative 2, intersections with vehicle delay thresholds near levels of significance could potentially be decreased by Alternative 2 project traffic. The Project TIA intersections anticipated to experience a LOS of D are primarily projected to experience delays that are at the lower end of the threshold for LOS D. For example, a LOS of D is defined as having a delay of 35 to 55 seconds for a signalized intersection. The signalized intersection nearest the upper range of LOS D is I-10 EB Ramp/Garnett Avenue with a delay of 40.6 seconds (2024 EAPC Conditions). A reduction in project trips could result in a reduction in delay at this intersection that equates to a LOS of C considering that the existing (2022) delay is estimated to be 29.8. Therefore, this Alternative would result in decreased traffic at intersections due to the approximate reduction by half of the trips anticipated to be generated by Alternative 2. As is the case with the proposed project, however, mitigation through the implementation of **TRA-1,** which requires the development and implementation of a Traffic Control Plan during construction activities, as well as the payment of DIF fees and fair share contributions to planned improvements would be expected to reduce impacts to less than significant levels.

This Alternative is anticipated to have a lower daily VMT because it generates fewer daily trips. Alternative 2 is expected to generate approximately half of the trips compared to the proposed project due to the decreased square footage, decreased employees and truck trips. Like the proposed project, Alternative 2 impacts are anticipated to be less than significant.

Like the proposed project, Alternative 2 would result in less than significant impacts. The Indian Canyon Drive/19th Avenue would continue to require a fair share contribution toward a traffic signal, as it is an existing (2022) unacceptable condition with or without the proposed project or Alternative 2. Like the proposed project, Alternative 2 would not include a substantial amount of additional vehicle trips on and around Indian Canyon Drive north of the I-10. The proposed project was determined to have less than significant impacts relative to the design of transportation facilities or systems. Because Alternative 2 would reduce traffic trips by approximately half, and would be required to pay DIF and would be reviewed and approved by City of Palm Springs, impacts would also be less than significant.

Alternative 2 would contribute to Vehicle Miles Traveled (VMT) in the area. It is anticipated to result in a lower contribution in VMT due to the reduction in facility size but is anticipated, like the proposed project, to have a significant impact relative to VMT per employee due to project use. The proposed project has a significant and unavoidable impact relative to VMT Service Population estimates for baseline and cumulative conditions because both the Baseline (59.77) and Cumulative (52.24) proposed Project Generated VMT per Service Population (SP) exceeded the Baseline (34.52) and Cumulative (34.52) City VMT per SP Threshold.

Alternative 2 would be expected to contribute to the improvement of the local roadway system, similar to the proposed project. Overall, Alternative 2 would generate fewer daily trips on area roadways, resulting in decreased impacts associated with the area roadway system and potentially decreased yet still significant VMT impacts, compared to the proposed project.

Tribal Cultural Resources

Alternative 2 would disturb the entire property and result in similar impacts to Tribal cultural resources as the proposed project. Following consultation with ACBCI, the Tribe provided the City with a letter indicating that they requested site records and conditions of approval for the project, and concluded consultation. The proposed project was determined to have less than significant Tribal cultural resource impacts with implementation of mitigation measure **CUL-1**, which requires cultural and tribal monitoring during ground disturbing activities. Alternative 2 would be required to implement the same mitigation measure to reduce impacts to less than significant levels. However, neither Alternative 2 nor the proposed project have significant impacts on Tribal cultural resources.

Utilities and Service Systems

Water

Alternative 2 would result in an increase in water demand during operation of the proposed high cube warehouse uses, and still require additional water lines to support the uses. Compared with the proposed project, Alternative 2 would reduce the water consumption by half to approximately 59.1 acre-feet per year (AFY) or 1.49 acre feet per acre (due to the reduction in the size of the building and number of employees). However, both projects would result in less than significant impacts, and neither scenario would result in significant impacts.

Wastewater

Wastewater service would be provided to the property by MSWD. Wastewater services required for Alternative 2 would be similar to the proposed project. Wastewater generated by the project would be somewhat reduced by half to 7,200 GPD or 0.72 MGD when compared to the proposed project, due to the reduced warehouse size associated with this alternative. This would be 3 percent of the HWWTP capacity of 2.3 MGD and wastewater treatment capacity would be sufficient to serve the alternative.

The offsite sewer line would still be required to provide wastewater services to the site. The offsite connection would still occur in 19th Avenue. The proposed wastewater connections lines would be identical to that for the proposed project.

Both projects would result in less than significant impacts, and neither scenario would result in significant impacts.

Dry Utilities (Electricity, Natural Gas, and Telecommunications)

Alternative 2 would reduce the square footage of the warehouse building by half but would still develop the entire site, which would require the same extension of the existing infrastructure located adjacent to the site. Like the proposed project, this Alternative would still be required to submit plans through the City and utility providers. SCE would still provide power to the site, and the project would still need to connect to the existing Spectrum infrastructure for telecommunications services. Similar to the proposed project, additional offsite infrastructure would not be required for dry utilities under this Alternative. Impacts under Alternative 2 for electricity, natural gas, and telecommunications infrastructure would be similar to the proposed project and impacts would remain less than significant.

Solid Waste

Palm Springs Disposal Services (the local waste provider) would provide the property with solid waste services. Construction waste produced by Alternative 2 would be regulated in the same manner as the proposed project, would not be significant and would cease after the proposed facilities were developed.

Solid waste generated by Alternative 2 would be less than the waste generated by the proposed project, because of the reduction in size of the facility and reduced number of employees. Under this Alternative the estimated solid waste is 2.48 tons per day and less than 1 percent of daily capacity for the local transfer station and landfill. Compared to Alternative 2, the proposed project would generate greater amounts of solid waste, but impacts would be less than significant in either case.

7.5.2 Alternative 3 – Industrial Business Park

The existing zoning designation for the project property is Manufacturing (M-2). Under the M-2 Zoning Development Alternative, the property would be built as a typical industrial business park development within the M-2 zoning designation. According to Section 92.17.1.01 of the Palm Springs Municipal Code uses permitted within M-2 zones could include adult oriented business; animal day care; animal hospitals, including kennels; cannabis lounge or dispensary; fabrication (i.e., manufactured housing, fencing, cans and containers, vehicle parts); manufacturing (i.e., compounding processing, packaging or treatment of products, saw and planing mills, stone cutting and related activities); cannabis transportation and distribution facility; equipment sales, rental and storage; and wholesale, warehouse, distribution, fulfillment, and import/export centers. Alternative 3 proposes to develop a 182,000-square-foot storage facility on 7-acres, a 26,000-square-foot vehicle storage and rental facility (i.e., Uhaul) on 1 acre, two 26,000-square-foot manufacturing buildings (i.e., stone cutting, lighting and wiring) on 2 acres, two 26,000-square-foot buildings for equipment sales on 2 acres, and two 274,000-square-foot wholesale, warehouse, distribution, fulfillment, and import/export centers on 21 acres. It is estimated that open space areas for retention, irrigation

ditches and landscaping would take up 5 acres of the project site. The buildings proposed in Alternative 3 would conform to the Municipal Code, Section 92.17.1 for setbacks, heights, parking, etc. Access to the site would be at similar locations as the proposed project (i.e., one on 19th Avenue for truck access, and two on Indian Canyon Drive for non-truck access). The uses are summarized in the table below. An analysis of impacts for Alternative 3 is provided below:

Table 7-4 Alternative 3 Land Use Summary

Use	Acres	Building Area (Square Feet)
Storage Facility	7	182,000
Vehicle Rental and Storage	1	26,000
Manufacturing Use Building 1	1	26,000
Manufacturing Use Building 2	1	26,000
Equipment Sales Building 1	1	26,000
Equipment Sales Building 2	1	26,000
Warehouse/Distribution/ Fulfillment 1	10.5	274,000
Warehouse/Distribution/ Fulfillment 2	10.5	274,000
Landscape	5	--
Total	38	860,000

Aesthetics

Under the Industrial Business Park Alternative, impacts to the surrounding scenic vistas and scenic quality would occur but would be similar to the proposed project. Alternative 3 would impact existing scenic vistas to the north, west, and south of the project. When viewed on the public rights-of-way (Indian Canyon Drive to the east and 19th Avenue to the south) the distant mountains to the southwest, west, northwest, and north are currently unobstructed. Alternative 3 would result in an increased building area (120,640 square feet more than the proposed project). However, instead of developing one large building for fulfillment operations, Alternative 3 proposes multiple buildings for industrial uses (see table above), which would allow for various breaks between buildings. The breaks between the buildings would allow motorists and pedestrians to see more of the scenic vistas to the southwest, west, northwest, and north when viewed from the public rights-of-way. Additionally, buildings proposed in Alternative 3 would comply with building height allowances and setbacks established in Section 92.17.1.03 in the Municipal Code for M-2 zones. Thus, impacts would be less than significant and reduced when compared to the proposed project.

Alternative 3 would result in similar impacts to scenic quality compared to the proposed project because the architecture, landscaping, and development standards are all required to adhere to Section 92.17.1.03. As determined in **Section 4.1, *Aesthetics,*** the project would have less than

significant impacts to scenic quality. Therefore, Alternative 3 would have less than significant impacts to scenic quality since both would adhere to Section 92.14.1.03.

Alternative 3 would result in similar impacts to light and glare, compared to the proposed project since both projects would include illumination onsite for security reasons, and to provide lighting for employees walking to their vehicles, signage lighting, building entrance lighting, and landscape lighting. Both Alternative 3 and the proposed project would result in the development and operation of an industrial facility. Lighting for security, signage, parking areas, building entrances, etc. would be required to comply with Section 93.21.00 of the Municipal Code (Outdoor lighting standards). Per Section 93.21.00 of the Municipal Code, outdoor lighting is required to consist of full cutoff luminaries shielded or constructed so that all of the light rays emitted by the fixtures are projected below the lowest point on the fixture. Additionally, the Municipal Code requires lighting in parking lots and area LED lighting be a minimum footcandle (fc) of 1 fc; 1 to 2 fc average maintained light level; not exceed a four to one average-to-minimum uniformity ratio; and not exceed a sixteen to one maximum to minimum uniformity ration. **Section 4.1** confirms that the project will comply with the City's lighting standards. Similar to the proposed project, Alternative 3 would be required to comply with Section 93.21.00 of the Municipal Code.

The Industrial Business Park Alternative would result in reduced impacts to aesthetics compared to the proposed project. Impacts associated with views of scenic vistas, scenic quality, and light and glare would be less than significant under both Alternative 3 and the proposed project.

Air Quality

Alternative 3 would occupy the same site acreage and would involve a total construction period of approximately 480 days based on the building area, which is approximately 13 days longer than the project. Therefore, the short-term emissions from construction equipment and material installation (pavement and architectural coatings) would occur over a slightly longer period, resulting in emission of VOCs, NO_X, SO_X, CO, PM_{10}, and $PM_{2.5}$ from various stages of construction activities. However, there is no distinct aspect of Alternative 3 that would entail a higher magnitude or a more intense use of construction-related equipment that would translate to higher peak emissions on a per-day basis. Therefore, short-term construction impacts are expected to be less than significant in relation to the SCAMQD Air Quality Significance Thresholds. Such an impact would be equivalent to the proposed project's less than significant impact.

Construction emission levels from the extended timeline of Alternative 3 would be small enough that their impact may not be detected in the regional models that are currently used to determine ambient air quality levels for health-related purposes. Localized construction and operational emissions associated health risks and other sources of emissions, including odors, would also be less than significant in relation to sensitive receptors, the nearest of which is a residence located at 17725 Covey Street, approximately 2,054 feet to the northeast of the project site. The temporary

construction activity and operation of heavy-duty diesel trucks accessing the site under Alternative 3 would result in short-term and operational toxic air contaminants (TAC) from diesel particulate matter (DPM).

The relatively longer construction duration, by approximately 13 days, and larger building capacity associated with Alternative 3 would entail potentially higher levels of TACs and therefore have an increased capacity to incur an incremental cancer and non-cancer risk attributable to construction-source project DPM emissions, particularly in relation to the nearest sensitive receptors located over 2,000 feet from the project site. Similarly based on the larger building area and operational capacity, Alternative 3 would result in relatively higher operational DPM emissions on the three types of receptors: residents in the area, workers near the project, and school children.

Based on the trip generation analysis provided in the *N. Indian Canyon/19th Ave. High-Cube Warehouse, Project Alternatives*, operation of Alternative 3 would result in approximately 4,338 passenger car equivalent trips, representing an increase of approximately 103% compared to the 2,134 daily trips associated with the proposed project. Alternative 3 would be expected to consume more electricity from operations (2,104,347.6 kWh more than the project), primarily based on a larger building area (see Energy section below). Given that mobile emission sources attributed to vehicle trips and area emission sources attributed to energy uses are a majority of operational criteria air emissions, emission impacts from Alternative 3 would be greater than the proposed project and would potentially exceed the SCAMQD Air Quality Significance Thresholds. An unmitigated exceedance of operational criteria air pollutant emissions above the SCAQMD Air Quality Significance Thresholds may become detectable in the regional models that are currently used to determine ambient air quality levels for health-related purposes. Therefore, Alternative 3 may result in potential health-related air quality impacts from operations.

Alternative 3 would be expected to comply with the local land development (zoning) allowances and growth assumptions, but an exceedance in operational emissions, particularly ozone precursors and particulate matter may result in a conflict with the applicable AQMP 2022's efforts in reducing ozone and particulate matter levels toward regional attainment. Therefore, Alternative 3's impacts to the applicable air quality plan would be potentially significant.

Since Alternative 3 would be expected to have construction-source emissions over a slightly longer duration of activities and greater operational emissions attributed to the increase in daily trips, a proportional increase to the criteria mobile-source emissions would potentially lead to an exceedance of the SCAMQD Air Quality Significance Thresholds, including significant impacts on the local criteria pollutants (PM10 and Ozone/precursors) for which the project region is non-attainment under an applicable federal or state ambient air quality standard.

Operations involving access and circulation of diesel-engine trucks under Alternative 3 would result in DPM emissions, as the particulate components of mobile and stationary diesel engine exhaust. The

nearest residential sensitive receptor to the project is 17725 Covey Street, approximately 2,054 feet to the northeast of the project site. Operational emissions from this alternative would not be expected to result in an incremental risk of cancer cases or other health risks capable of exceeding the SCAQMD risk threshold of 10 excess cancers per million population because the nearest sensitive receptors are at too great a distance, as explained in **Section 4.2**.

Therefore, the potential impact in relation to sensitive receptors and adverse effects to a substantial number of people would be maintained at a less than significant level.

Alternative 3 would be expected to result in potentially significant impacts in relation to the SCAQMD Air Quality Significance Thresholds and such exceedances would result in a conflict with the applicable AQMP 2022's efforts in reducing ozone and particulate matter levels to reach regional attainment. Therefore, impacts to the applicable air quality plan would be potentially significant. Meanwhile, based on the site's location and separation from sensitive receptors, localized construction and operational emissions would not be expected to incur an increment in health-related risks.

Biological Resources

Under Alternative 3, impacts to biological resources would be the same compared to the proposed project, because the entire project site would be disturbed.

Alternative 3 would result in impacts to burrowing owls (*Athene cunicularia*), migrating nesting birds, and the Palm Springs Ground Squirrel (*Spermophilus tereticaudus*). However, these impacts would be mitigated to less than significant levels with the implementation of **Mitigation Measure BIO-1***,* **Mitigation Measure BIO-2,** and **Mitigation Measure BIO-3.**

Since Alternative 3 would develop the same area on the project site with an increased building size intensity, impacts to biological resources would not change.

Cultural Resources

Alternative 3 would fully develop the project site with an industrial park, encompassing the entire project site. The industrial park under this Alternative would have similar impacts to previously unknown cultural resources or human remains which could be uncovered during grading, construction, and any other ground disturbance activities. Therefore, impacts would be comparable to the proposed project, and Alternative 3 would implement **Mitigation Measure CUL-1** to reduce impacts to potential sensitive cultural resources to less than significant levels.

Energy

Development and operation of Alternative 3 would result in increased energy consumption compared to the proposed project.

Construction

Short-term energy consumption related to construction activities would occur during development of Alternative 3. Construction-related energy use would include the consumption of electricity for tools and power required for constriction trailers. Petroleum fuels, such as gasoline and diesel, would also be required during construction for the operation of machinery, large equipment, and employee vehicle and truck/vendor trips.

Alternative 3 proposes an increased building footprint (approximately 120,640 square feet more than the proposed project). Due to the increased building area proposed for Alternative 3, building construction duration would occur over 300 days for Alternative 3, compared to 287 days for the proposed project. Based on a CalEEMod modeling sample of the proposed project and alternatives, the Industrial Business Park Alternative would result in an approximately 4 percent longer construction duration than the proposed project. See Air Quality discussion above. Total construction activities for Alternative 3 would result in 13 more days than the proposed project, resulting in a similar electricity and fuel consumption as the proposed project. Additionally, construction-related energy consumption at the site would cease at the conclusion of construction. Since Alternative 3 would not result in substantially more construction days than the proposed project, as determined utilizing CalEEMod, neither the Industrial Business Park Alternative nor the proposed project would result in significant impacts to energy resources during construction of the site.

Operation

The operation of the 38-acre site would result in an increase in energy demand, via electricity and petroleum. Alternative 3 proposes the operation of more building square footage, therefore, Alternative 3 would result in increased consumption of energy during operation of the site. This Alternative would operate an 860,000-square-foot industrial business park, (building increase by 16 percent). Therefore, Alternative 3 would consume more electricity and natural gas than the proposed project annually. The industrial park land use in CalEEMod would consume 17,443.2 kWh of electricity and 27,586.7 kBTU of natural gas per 1,000 square feet annually. Since Alternative 3 proposes 120,640 more square feet of building floor area, Alternative 3 would result in approximately 15,001,152 kWh electricity consumed (2,104,347.6 kWh more than the project), and 23,724,562 kBTU natural gas[1]. Alternative 3 would not result in the wasteful and unnecessary consumption of electricity or natural gas because it will be designed and constructed in accordance with the City's latest adopted energy efficiency standards, which are based on the California Title 24 energy efficiency standards. Title 24 standards are widely regarded as the most advanced energy efficiency standards, would help reduce the amount of energy required for lighting, water heating, and heating and air conditioning in

[1] It should be noted that these are approximations based on CalEEMod default tables as a part of Appendix G of the CalEEMod User Guide for Version 2022.1. The default data assumes both Title 24 and non-Title 24 implementations. Project-specific energy use could be further mitigated with design features.

buildings and promote energy conservation. Overall, Alternative 3 would not result in the wasteful or unnecessary consumption of electricity or natural gas.

Operation of Alternative 3 would increase on- and off-site vehicle trips slightly from employees and truck trips because the increased variety of uses and the increased total floor area of the project and thus will generate more daily trips. Based on the North Indian Canyon and 19th Avenue High-Cube Warehouse Project Alternatives Memo Urban Crossroads generated, this Alternative is anticipated to have a higher daily VMT and VMT per Service Population because it generates 2,204 more daily trips than the proposed project (**Appendix L.1**), due to the increased diversity of uses and the increase in floor area of the project. Also see Transportation discussion below.

Table 7-5 Alternative 3 Trip Generation Comparison Passenger Car Equivalents (PCE)

Land Use	AM Peak Hour			PM Peak Hour			Daily
	In	Out	Total	In	Out	Total	
Alternative 3 Trip Generation Comparison							
Proposed Project[1]							
739,630 SF High Cube Fulfilment Center	89	29	118	44	111	155	2,134
Alternative 3[2]							
Industrial Business Park	356	75	431	79	310	389	4,338
Alternative 3 Delta (Alternative 3 – Proposed Project)	**267**	**46**	**313**	**35**	**199**	**234**	**2,204**

1. *Source: North Indian Canyon & 19th Avenue High-Cube Warehouse Project Alternatives (Urban Crossroads, January 18, 2024).*

As analyzed in **Section 4.5,** average fuel economies of vehicles accessing the project site can be expected to improve as older, less fuel-efficient vehicles are removed from circulation, and in response to fuel economy and emissions standards imposed on newer vehicles entering the circulation system. . The location of the project within 0.3 miles of an Interstate 10 interchange also tends to reduce the miles traveled. Operation of Alternative 3 is therefore expected to use decreasing amounts of petroleum over time. Petroleum consumption associated with the operation of Alternative 3 would not be considered excessive or wasteful, and impacts would be less than significant.

The construction and operation of both the Industrial Business Park Alternative would result in an increase in energy demand in the area, due to the proposed industrial uses. Alternative 3 would result in more energy consumption during construction and operation, due to the increased building floor area; however, neither the proposed project nor Alternative 3 would result in significant impacts regarding energy resources.

Geology and Soils

The project site is currently undeveloped. Under Alternative 3, an industrial park would be developed, covering the entirety of the project site.

To mitigate impacts from seismic events, structures proposed in Alternative 3 would be required to be developed to the most current state and local standards regarding building construction. The

project site is not located near a slope, and would not be impacted by rockslides or landslides. No septic systems are proposed. The potential for impacts related to loss of topsoil, sedimentation, erosion, and landform alterations associated with Alternative 3 would be the same compared to the proposed project, because Alternative 3 would develop the entire project site.

Similar to the proposed project, development of Alternative 3 would be required to implement the mitigation measures established in the project-specific Geotechnical Evaluation (**Appendix G**). **Mitigation Measure GEO-1** through **Mitigation Measure GEO-13** would be required to ensure that the Alternative comply with all grading and excavation codes as well as clearing, excavation, re-compaction, grading, footings, floor slabs, the requirement of paleontological monitoring, and all other requirements set forth in the Geotechnical Investigation.

These mitigation measures would apply equally to Alternative 3's impacts and reduce them to less than significant levels. Alternative 3 would result in similar less than significant impacts to geology and soils compared to the proposed project.

Greenhouse Gas Emissions

Construction of Alternative 3 for a larger building area occupying the same site would involve a total construction period of approximately 480 days based on the building area, which is approximately 13 days longer than the project. Therefore, the short-term GHG emissions from construction equipment would be relatively higher than the proposed project.

Operation of Alternative 3 would result in approximately 4,338 passenger car equivalent trips, representing an increase of approximately 103% compared to the 2,134 daily trips associated with the proposed project. Alternative 3 would also be expected to consume more electricity from operations (see Energy section above). Given that mobile emission sources attributed to vehicle trips and area emission sources attributed to energy uses are a majority of operational GHG emissions, impacts to GHG emissions from Alternative 3 would be potentially significant and unavoidable.

A larger building area with a mix of uses as proposed under Alternative 3 and greater emissions would potentially result in a conflict with the applicable plans, policies or regulations adopted for the purpose of reducing the emissions of greenhouse gases, including the 2022 Scoping Plan, potentially resulting in potentially significant impacts, as they were found for the proposed project.

Hazards and Hazardous Materials

Construction

Construction of Alternative 3 is expected to involve the temporary management and use of oils, fuels and other potentially flammable substances in a manner similar to the proposed project. Hazardous materials would be delivered, stored, and handled to manufacturer instructions and industry standards. The nature and quantities of these products would be limited to what is necessary to carry

out construction of Alternative 3 and are not anticipated to create significant impacts due to the limited quantities used in construction and the timeline of construction. Additionally, the contractor will be required to identify a controlled staging area within the project limits for storing materials and equipment, as required by a Storm Water Pollution Prevention Plan (SWPPP). Similar to the proposed project, Alternative 3 would implement safety procedures when using, handling, storing hazardous materials and impacts would be less than significant.

Operation

As previously stated, Alternative 3 proposes various industrial uses within the 38-acre site Operation of these industrial uses could involve the use of materials common to commercial or industrial developments that are labeled hazardous (e.g., solvents and commercial cleaners, petroleum products, and pesticides, fertilizers, and other landscape maintenance materials). Manufacturing and other chemical processing could occur in Alternative 3 because it is permitted within M-2 zoning designations.

If any use in Alternative 3 were to store hazardous materials in large quantities, the applicant would be required to submit a Hazardous Materials Business Plan (HMBP) to the Riverside County Department of Environmental Health (DEH) and Fire Department.

Any tenant proposed in Alternative 3, and all their employees would be required to comply with Occupational Safety and Health Administration (OSHA) regulations and standards. Additionally, hazardous materials, if onsite, would be handled in compliance with manufacturer's standards to ensure proper use and handling. The Industrial Business Park Alternative would implement safety procedures when using, handling, storing hazardous materials and impacts would be less than significant.

The City of Palm Springs has developed and maintains an extensive roadway network. Alternative 3 would not propose changes to that network. Gated access at 19th Avenue and into specific uses (such as the storage facility) would limit access to authorized personnel, trucks, and emergency vehicles. Vehicles accessing the street from the project would not interfere with evacuation routes or plans, insofar as Alternative 3 would not alter any existing street used for these purposes. Access points would be reviewed by the Fire Department, to ensure adequate access for emergency vehicles. This requirement would be included as a condition of approval for Alternative 3 and assures that on-site emergency access impacts would be less than significant. Implementation of Alternative 3 is not expected to interfere with critical facilities, emergency transportation and circulation, or emergency preparedness coordination.

Overall, the Industrial Business Park Alternative would result in similar impacts to hazards and hazardous materials, as compared to the proposed project, and both would be less than significant.

Hydrology and Water Quality

Alternative 3 would involve the same area of disturbance, approximately 38 acres. During construction and life of the project, Alternative 3 would be required to implement the various compliance plans under the Clean Water Act, National Pollutant Discharge Elimination System (NPDES), state, and local regulations to prevent violations or impacts to surface water quality standards and waste discharge requirements.

Implementation of a Stormwater Pollution Prevention Plan (SWPPP) would be required for the entire project site during the period of construction to comply with the most current NPDES General Permit. During the life of the project, water quality standards and waste discharge requirements would be met and demonstrated through a project-specific Water Quality Management Plan (WQMP). The on-site retention requirements for Alternative 3 would conform to City standards.

On the aspect of water demand in relation to groundwater supplies, a preliminary calculation, further discussed in the Utilities analysis below, estimated that Alternative 3 would involve a water demand of approximately 97.28 AFY based on the storage, vehicle rental, equipment sales, manufacturing, and warehouse distribution, and landscape uses contemplated for this scenario. This would be approximately 21.09 AFY (17.8 percent) lower than the 118.37 AFY associated with the approved WSA/WSV for the proposed project. Since the estimated water demand for Alternative 3 would be lower than a water demand value that has been approved in the WSA, it is expected that the local water supply would be able to meet the demand from Alternative 3. Alternative 3 would be subject to the locally adopted water-efficient landscape ordinance.

On the matter of groundwater quality, Alternative 3 would implement the standard requirements for non-structural and structural pollution source control measures that work toward the protection of groundwater quality.

Where applicable, the manufacturing facilities within Alternative 3 may be required to obtain coverage and comply with the State's Industrial Stormwater Program (Industrial General Permit - IGP). The final determination of IGP coverage will be based on whether the proposed manufacturing facilities or other facilities under Alternative 3 will occur within the range of Standard Industrial Classification (SIC) codes for which coverage is required. If Industrial General Permit coverage were required, it would be issued specifically to the manufacturing operator.

Compliance under the Industrial General Permit would impose stricter practices to prevent pollution discharges and other activities from the manufacturing component from coming into contact or impacting the storm drainage and retention systems.

Alternative 3 will not result in any physical modifications to an existing recharge facility or result in any stormwater runoff condition capable of interfering with the facility operation. The requirement for on-site retention facilities would contribute to infiltration and groundwater recharge.

Alternative 3 would result in an increase in impervious land cover through the introduction of structures, hardscape and streets. However, the proposed storm drainage system with required on-

site retention facilities and stabilized surfaces would control the volume and conveyance of runoff to prevent erosion and siltation. Flooding would be prevented through compliance with the City's engineering standards for new development. Since Alternative 3 is required to retain urban runoff on-site, it would not result in a discharge condition affecting public storm drainage infrastructure.

Moreover, water quality pollution source control measures and stormwater management would be held to the WQMP and industrial SWPPP during the life of the Alternative 3 project.

Therefore, the potential impacts from Alternative 3 to hydrology and water quality thresholds would be less than significant, and consistent with the proposed project.

Noise

The Industrial Business Park Alternative would result in the development and operation of the 38-acre site.

Construction

Development of Alternative 3 would involve the construction of multiple industrial uses in separate buildings. Similar to the proposed project, construction of the site would not result in significant noise because Alternative 3 is located 2,054 feet from the closest sensitive receiver. As indicated in **Section 4.10,** the maximum noise generated by construction activities is 47.1 dBA Leq at this sensitive receptor, due to the property's distance from the residential homes. Additionally, noise would be limited to allowed construction hours of operation to lessen the impacts of construction noise (Municipal Code Section 8.04.220). Although Alternative 3 proposes approximately 120,620 square feet more building floor area than the proposed project, Alternative 3 would also result in less than significant noise levels during construction because construction of the industrial business park would include the use of similar construction equipment and activities as the proposed project, which were determined to generate noise levels of up to 47.1 dBA Leq at the sensitive receptor. Alternative 3 would be required to comply with the City's standards for construction noise, such as permitted construction hours.

Similar to the proposed project, Alternative 3 would not generate significant groundborne vibrations because construction would occur at distances ranging from 2,054 to 3,327 feet from primary construction activities, and construction vibration velocity levels are estimated to be less than 0.01 PPV (in/sec) and will not exceed City of Palm Springs vibration threshold of 0.30 PPV (in/sec). Since Alternative 3 proposes similar construction activities, impacts from noise or vibration during construction from Alternative 3 would be less than significant, as are the proposed project's impacts.

Operation

Operational noise associated with Alternative 3 traffic would be increased as compared to the proposed project. Alternative 3 would include the operation of an 860,000-square-foot industrial

business park. The closest noise sensitive receiver is a residential structure approximately 2,054 feet north of the project boundary. The distance of the residential buildings to the project site would reduce potential impacts during operation of Alternative 3. Additionally, Alternative 3 uses would occur inside buildings. Alternative 3 would result in 577 more daily vehicle trips during operation compared to the proposed project, resulting in increased off-site traffic noise associated with the increased daily trips, compared to the proposed project.

Operational noise and groundborne vibration from Alternative 3 will not be significant. As previously stated, Alternative 3 would result in 577 more daily trips during operation compared to the proposed project. It is likely that truck traffic associated with the 548,000-square-foot warehouse/distribution/fulfillment facility will likely not pass sensitive receptors (to the north), since they would travel to and from the Interstate 10 freeway (to the south). Groundborne vibrations from truck traffic associated with the warehouse/distribution/fulfillment facility would not be significant. However, trucks and vehicles accessing the storage facility, vehicle rental, manufacturing buildings, and equipment sales businesses proposed in Alternative 3 would utilize Interstate 10, Indian Canyon Drive, as well as other local streets, including the segment of Indian Canyon Drive north of the project (if coming from Desert Hot Springs). The use of vehicles along local streets would pass sensitive receptors, including those located 2,054 to 3,327 north of the project along Indian Canyon Drive. Heavy traffic at 300 feet generates a noise level of 60 dBA, as indicated in Tabel 4.10-4, *Typical Noise Levels,* in **Section 4.10.** 60 dBA is considered conditionally acceptable in areas designated as residential land uses (single and multifamily dwellings). It should be noted that vehicle traffic along local roadways will be infrequent and dispersed throughout the day. According to the FTA *Transit Noise Impact and Vibration Assessment*, buses or trucks at 50 feet result in approximately 62 VdB, where a bus or truck driving over a bump in the road would generate 72 VdB when observed 50 feet from the source. Ground-borne vibration is normally perceptible to humans at approximately 65 VdB. However, for most people, a vibration velocity level of 75 VdB is the approximate dividing line between barely perceptible and distinctly perceptible levels. Based on the FTA's *Transit Noise Impact and Vibration Assessment*, vehicle and truck traffic passing these residential structures would not result in significant levels of ground-borne vibration. Additionally, the operation of the storage facility, vehicle rental, manufacturing use, and equipment sales businesses would occur during specific operational hours, which typically would not occur during nighttime hours (i.e., between 10 p.m. to 7 a.m.), which are hours sensitive receptors could be disturbed by noise or ground-borne vibration. Therefore, Alternative 3 would result in less than significant impacts to noise and ground-borne vibration.

Overall, Alternative 3 would result in increased noise and similar vibration impacts, as compared to the proposed project, but both would be less than significant.

Population and Housing

The subject property is currently vacant and does not provide housing for the City of Palm Springs. Additionally, the subject property is not zoned to accommodate housing in the City, as it is located in an area zoned for manufacturing and industrial operations.

Alternative 3 proposes an industrial business park. As analyzed in the Transportation discussion below, Alternative 3 would result in increased daily trips and higher daily vehicle miles traveled (VMTs) and VMT per service population because it generates more daily trips. Alternative 3 is expected to generate 577 more daily trips compared to the proposed project due to the increased diversity of uses and the slight increase in total floor area of the project. Alternative 3 would result in increased daily trips due to the customers visiting the mixed uses proposed for the industrial business park during operating business hours. However, Alternative 3 would likely result in less employees compared to the proposed project, due to the reduced employee numbers required for self-storage facilities and vehicle rental and storage facilities, as well as the reduced building square footage of the fulfillment center. The storage facility and vehicle rental facilities only require a few people onsite to assist customers, if needed, periodically during operational hours. According to the 2023 Updated Land Use Element, the City of Palm Springs includes enough capacity for employment to increase from approximately 28,000 jobs in 2020 to almost 60,000 jobs over buildout of the City. SCAG anticipates approximately 41,000 jobs in Palm Springs by 2035. Additionally, the City estimates 11,638,620 square feet of industrial development to occur during City buildout. As such, Alternative 3, which would result in an 860,000-square-foot industrial business park and could result in less jobs compared to the proposed project within predicted job growth expectations. Overall, Alternative 3 would not result in unplanned employment growth exceeding the City's or SCAG's projections. Therefore, impacts are anticipated to be less than significant. Employees would reside in the City of Palm Springs and surrounding areas, therefore, impacts to population, employment, and housing would be less than significant with both the proposed project and Alternative 3.

Both Alternative 3 and the proposed project would require the site's connection to sewer infrastructure. Construction will occur on 19th Avenue from an existing 6-inch sewer line approximately 650 feet east of Indian Canyon Drive in 19th Avenue. The connection to the sewer lines will not result in unplanned growth because the City of Palm Springs and the sewer provider (MSWD) anticipate growth in this area of the City in the General Plan and infrastructure plans. Existing water and electrical utilities occur along the rights-of-way immediately adjacent to the project (i.e., Indian Canyon Drive and 19th Avenue). Alternative 3 would connect to the existing infrastructure. The site's connection to the infrastructure would result in less than significant impacts.

Both Alternative 3 and the proposed project would result in less than significant impacts.

Public Services

Similar to the proposed project, Alternative 3 would introduce uses that would place additional demand on the City of Palm Springs' public services. There would be an increased demand in police

services, fire and emergency services as a result of the development of Alternative 3 due to the proposed diversity of uses. However, like the proposed project, Alternative 3 would be required to comply with applicable policies and codes imposed by the City and would be subject to review by the fire and police departments to ensure access and other safety measures are implemented at the site.

Policies and codes that all alternatives, including the project, would be required to comply with include Ordinance No. 2078 which includes Section 202, the Five Minute Fire Department Response Time. The project will also adhere to Policy SA 5.3 which requires the use of fire-resistant building materials, the incorporation of fire sprinklers, when necessary, compliance with CAL FIRE Fire Safe Regulations and Fire Hazard Reduction Around Buildings and Structures Regulations, the development of a Fire Protection Plan, adherence to the CBC and California Fire Code, and ensuring adequate access for emergency vehicles, as well as Policy SA 5.13 which requires all new construction to use noncombustible roofing materials. Additionally, all alternatives would be required to follow Policy SA 8.6 which requires that all buildings subject to City jurisdiction adhere to fire safety codes, and Policy SA 8.9 which requires the installation of fire hydrants, fire sprinkler systems, and wet and dry on-site standpipe systems. Furthermore, the project will adhere to the California Fire Code. The California Fire Code and the policies and actions described above are City standards that are required to be implemented. With the implementation of the City's policies and action, the adherence to California Fire Code, and the City and Fire Department's review of the project plans to ensure that the project would meet fire protection requirements, Alternative 3's impact on fire services would be less than significant.

Alternative 3 would result in similar impacts to public services compared to the proposed project since the Alternative would consist of similar land uses. Both scenarios would result in less than significant impacts.

Transportation

Alternative 3 would result in the development and operation of the 38-acre Industrial Park site, resulting in an increase in traffic impacts.

Construction

Short-term construction vehicle trip impacts would result from the development of Alternative 3. A Traffic Control Plan would be required to be implemented throughout all construction activities, consistent with Mitigation Measure **TRA-1**. Construction impacts would be generally limited to permitted construction activity hours. Additionally, construction traffic would cease once construction of the facilities was complete. Primary and secondary access to the site will occur along Indian Canyon Drive and 19th Avenue. These roadways will provide public and emergency access in to and out of the property. Similar to the proposed project, Alternative 3 will not result in significant traffic impacts.

Operation

Alternative 3 operations would result in an increase of transportation/traffic in the area. Estimates are shown in **Table 7-6** below. All trips are represented in Passenger Car Equivalents (PCE). **Table 7-7** illustrates the calculations utilized for High cube warehouse trips in lieu of the ITE trip generation rates.

Table 7-6 Trip Generation Rates Passenger Car Equivalents (PCE)[1]

Trip Generation Rates									
Land Use	ITE LU Code	Quantity *(note 2)*	AM Peak Hour[2]			PM Peak Hour[2]			Daily
			In	Out	Total	In	Out	Total	
High Cube Warehouse	-	TSF	0.121	0.039	0.160	0.058	0.149	0.207	2.887

3. *North Indian Canyon & 19th Avenue High-Cube Warehouse Traffic Analysis (Urban Crossroads, March 1, 2023).*

4. AM/PM peak hour (in/out) splits are estimated from ITE 154 (High-Cube Transload and Short-term Storage Warehouse.

Table 7-7 Alternative 3 Trip Generation Comparison Passenger Car Equivalents (PCE)[3]

Land Use	AM Peak Hour			PM Peak Hour			Daily
	In	Out	Total	In	Out	Total	
Alternative 3 Trip Generation Comparison							
Proposed Project[1]							
739,630 SF High Cube Fulfilment Center	89	29	118	44	111	155	2,134
Alternative 3[2]							
7 ac storage facility, 1 ac Vehicle Rental, 2-26K SF Manufacturing Use Facilities and 2-26K Equipment Sales Buildings, 2-274K SF Warehouses. 860,000 SF total.	356	75	237	79	310	257	2,711
Alternative 3 Delta (Alternative 3 – Proposed Project)	**267**	**46**	**313**	**35**	**199**	**234**	**577**

1. *North Indian Canyon & 19th Avenue High-Cube Warehouse Traffic Analysis (Urban Crossroads, March 1, 2023).*

2. N. Indian Canyon/19th Ave. High-Cube Warehouse, Project Alternatives, Traffic Memo (Urban Crossroads, January 18, 2024).

3. PCE = Passenger Car Equivalent (Passenger Cars + Net Truck Trips)
The County of Riverside TIA & VMT Guidelines (December 2020) provide the following PCE factors: 2-axle = 1.5; 3-axle = 2.0; 4+ axle = 3.0. Since the WSP study does not provide a breakdown between the 2 to 4-axle trucks, the highest PCE factor of 3 has been utilized.

Operation of Alternative 3 would increase on- and off-site vehicle trips from employees and truck trips because the increased variety of uses and the increased total floor area of the project and thus will generate more daily trips leaving the project site.

Given the projected increase in vehicle trips generated by this Alternative , intersections with vehicle delay thresholds near levels that would cause concern for functionality could potentially be increased by Alternative 3 traffic. An intersection which has a delay of LOS C with proposed project traffic volumes, could be increased but not beyond the City's acceptable levels with Alternative 3. The Project TIA intersections estimated to result in a LOS of D are primarily projected to experience delays that are at the lower end of the threshold for LOS D. For example, a LOS of D is defined as having a delay of 35 to 55 seconds for a signalized intersection. The signalized intersection nearest the upper range of LOS D is the I-10 EB Ramp/Garnett Avenue with a delay of 40.6 seconds (2024 EAPC Conditions). An increase in trips would result in an increase in delay at this intersection, however the

existing (2022) delay is estimated to be 29.8. The increase in trip generation is not expected to be high enough to increase delay at this intersection to greater than 55 seconds. The intersection at Dillon Road and Indian Canyon is another example of in intersection of potential concern. According to the Project Alternatives memo (**Appendix N**) possible additional lanes might be required to maintain an acceptable level of service particularly for the intersection of Indian Canyon Drive and Dillon Road or the intersection of I-10 EB Ramp/Garnet Avenue. Therefore, this Alternative could result in increased traffic at intersections as is the case with the proposed project, however, implementation of **TRA-1 1** (Traffic Control Plan) during construction activities**,** and the payment of DIF fees and fair share contributions to planned improvements would be expected to reduce impacts to less than significant levels.

The proposed project is anticipated to result in significant and unavoidable impacts relative to VMT. Like the proposed project, Alternative 3 would contribute to Vehicle Miles Traveled (VMT) in the area, and similar to the proposed project, is anticipated to have a significant impact. Both Alternative 3 and the proposed project would have a significant and unavoidable impact relative to VMT Service Population estimates for baseline and cumulative conditions.

Alternative 3 would be expected to contribute to the improvement of the local roadway system, similar to the proposed project. Overall, Alternative 3 would generate increased daily trips on area roadways, resulting in increased impacts associated with the area roadway system and increased VMT impacts, compared to the proposed project.

Tribal Cultural Resources

Alternative 3 would result in similar impacts to tribal cultural resources as the proposed project. Alternative 3 would be required to implement **Mitigation Measure CUL-1** and **CUL-2**.

The implementation of **Mitigation Measure CUL-1** and **CUL-2** is acceptable to ACBCI and reduces their concerns regarding the project's impact and ensures that the proposed project as well as Alternative 3 would have less than significant impacts. Alternative 3 nor the proposed project have any significant and unavoidable impacts to tribal cultural resources.

Utilities and Service Systems

Water

Alternative 3 would have similar impacts to the proposed project since it would still result in an increase in water demand during operation of the projects and would require additional water lines to support the uses. Compared with the proposed project, Alternative 3 would demand approximately 97.28 acre-feet per year (AFY) (21.09 ACY a year less than the proposed project) or 1.94 acre feet per acre. This is slightly reduced from the proposed project because Alternative 3 would have reduced landscape and hardscape areas as a result of more building square footage Both Alternative 3 and the proposed project would result in less than significant impacts.

Wastewater

Wastewater service would also be provided to the property by MSWD. Wastewater services required for Alternative 3 would be increased compared to the proposed project due to the increased square footage. Under this Alternative, wastewater demand is expected to be approximately 17,660 GPD (3,260 GPD more than the project) or 0.1 MGD, which is 7 percent of the HWWTP capacity of 2.3 MGD. Wastewater generated by this Alternative would be increased when compared to the proposed project, due to the increased square footage with Alternative 3, and wastewater treatment capacity would be sufficient to serve the alternative. The offsite sewer line would still be required to provide wastewater services to the site. The offsite connection would still occur in 19th Avenue. The proposed wastewater connections lines would not be any greater than the lines required for the proposed project since the proposed private sewer line could still accommodate the additional flow.

Both Alternative 3 and the proposed project would result in less than significant impacts.

Dry Utilities (Electricity, Natural Gas, and Telecommunications)

Alternative 3 would require the same extension of the existing infrastructure located adjacent to the site. Like the proposed project, this Alternative would still be required to submit plans through the City and utility providers. Alternative 3 would result in increased consumption of energy during operation of the site. This Alternative would operate an 860,000-square-foot industrial business park, (building increase by 16 percent). Therefore, Alternative 3 would consume more electricity and natural gas than the proposed project annually. The industrial park land use would consume 17,443.2 kWh of electricity and 27,586.7 kBTU of natural gas per 1,000 square feet annually. Alternative 3 would result in approximately 15,001,152 kWh electricity consumed (2,104,347.6 kWh more than the project), and 23,724,562 kBTU natural gas. Alternative 3 would not result in the wasteful and unnecessary consumption of electricity or natural gas because it will be designed and constructed in accordance with the City's latest adopted energy efficiency standards, which are based on the California Title 24 energy efficiency standards. The project would still need to connect to the existing Spectrum infrastructure for telecommunications services. Similar to the proposed project, additional offsite infrastructure would not be required for dry utilities under this Alternative. Impacts under both Alternative 3 and the proposed project for electricity, natural gas, and telecommunications infrastructure would be less than significant.

Solid Waste

Palm Springs Disposal Services would provide the property with solid waste services. The development would require solid waste services to remove waste produced by construction and operation activities. However, construction waste produced by Alternative 3 would not be significant and would cease after the proposed facilities were developed.

Solid waste generated by Alternative 3 would be similar to the proposed project due to the industrial land uses. However, Alternative 3 would likely result in less employees compared to the proposed project, due to the reduced employee numbers required for self-storage facilities and vehicle rental and storage facilities, as well as the reduced building square footage of the fulfillment center. As shown in the table below, the estimated solid waste under Alternative 3 is 12,212 pounds per day (6.1 tons per day) and 2,223.49 tons per year, which is higher than the proposed project's generation of 9,922.76 tons per day (4.96 tons per day) and 1,812.31 tons per year. The El Sobrante landfill would be the nearest landfill that could accept the 6.1 tons per day since it has a permitted capacity of 16,054 tons per day.

Table 7-8 Alternative 3 Solid Waste Generation Table

Land Use	Size (Square Feet)	Rate	Solid Waste (pounds per day)	Solid Waste (tons per year)
Manufacturing/Warehouse	860,000	1.42 lb/100 sq.ft. /day	12,212	2,223.49
Total			**12,212**	**2,223.49**

Compared to Alternative 3, the proposed project would generate comparable amounts of solid waste, and impacts would be less than significant. Neither scenario would result in significant and unavoidable impacts.

7.6 Environmentally Superior Alternative

The purpose of the Alternatives analysis is to explain potentially feasible ways to avoid or minimize the significant effects identified for the project. State CEQA Guidelines, Section 15126.6(e)(2) also requires an EIR to identify an environmentally superior alternative among those evaluated in an EIR.A summary and comparison of impacts associated with the project Alternatives is provided in **Table 7-9, *Comparison of Alternatives to Project***.

The No Project Alternative would not result in impacts to the project site since there would be no development. As described above, the No Project Alternative would eliminate potential impacts associated with construction and operation related to aesthetics, air quality, biological resources, energy resources, geology and soils, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, noise, population and housing, public services, transportation, and utilities, compared to the proposed project. Of the Alternatives considered in this Draft EIR, the No Project Alternative is environmentally superior to the other Alternatives because this Alternative would avoid any impacts identified for the project or any other alternative.

Although Alternative 1 is environmentally superior, it does not meet any of the objectives of the proposed project because it would not involve development of the site. Alternative 1 would not:

promote quality development consistent with the goals and policies of the City General Plan; develop a state-of-the-art industrial fulfillment center in the City's Industrial land use designation; provide employment opportunities and growth in the City; concentrate nonresidential uses near existing roadways, highways, and freeways to reduce environmental impacts related to truck traffic congestion, air emissions, and industrial noise; or create a project that takes advantage of existing infrastructure, including the project's proximity to major regional roadways. Additionally, there is no certainty that the project site would remain undeveloped in perpetuity. CEQA Guidelines Section 15126.6(e)(2) states that if the No Project alternative is identified as the environmentally superior alternative, then an environmentally superior alternative should be identified among the other alternatives.

Among the other alternatives, Alternative 2 (reduced intensity project) would be the environmentally superior alternative because it would cause incremental reductions with respect to impacts related to all of the environmental topics except biology, cultural resources, geology and soils, hazards (construction), hydrology, and tribal cultural resources, where the impacts are expected to be similar to those resulting from the proposed project because of similar land disturbance. Although impacts would be similar under the Reduced Intensity Alternative compared to the proposed project, mitigation measures would still be required to mitigate impacts to biological resources, cultural resources, geology and soils, and tribal cultural resources. Alternative 2 would result in reduced impacts to aesthetics, air quality, energy resources, greenhouse gas emissions, hazards (operation), noise, population and housing, public services, transportation, and utilities, due to the reduced building area. In addition, Alternative 2 meets all of the objectives proposed for the project, however, due to the reduced building size, it does so to a lesser degree. Specifically, Alternative 2 promotes quality development consistent with the goals and policies of the Palm Springs General Plan; would develop a state-of-the-art industrial fulfillment center in the Industrial land use area in Palm Springs that is consistent in use and look with the existing developments in the surrounding area; provides employment opportunity and growth in the City's Industrial land use designation north of the Interstate 10 freeway; concentrates nonresidential uses near existing roadways, highways, and freeways in an effort to isolate and reduce any potential environmental impacts related to truck traffic congestion, air emissions, industrial noise to the greatest extent feasible; and creates a project that takes advantage of existing infrastructure, including the proximity to major regional roadways, such as Interstate 10, and other similar infrastructure. Therefore, Alternative 2 is the environmentally superior alternative.

Alternative 3 (Industrial Business Park) would be likely to result in incremental increased impacts to air quality, energy (electricity, natural gas and petroleum), greenhouse gas emissions, noise, and transportation. These increases in Alternative 3 are due to increased employees and daily trips associated with the various industrial businesses. Since Alternative 3 would develop the 38-acre site with industrial uses similar to the proposed project, Alternative 3 would result in similar and

comparable impacts to aesthetics, biological resources, cultural resources, hazards and hazardous materials, hydrology and water quality, population and housing, public services, and tribal cultural resources, compared to the proposed project. The Industrial Business Park Alternative meets all of the objectives proposed for the project. Specifically, Alternative 3 promotes quality development consistent with the goals and policies of the Palm Springs General Plan; would develop a state-of-the-art industrial fulfillment center in the Industrial land use area in Palm Springs that is consistent in use and look with the existing developments in the surrounding area; provides employment opportunity and growth in the City's Industrial land use designation north of the Interstate 10 freeway; concentrates nonresidential uses near existing roadways, highways, and freeways in an effort to isolate and reduce any potential environmental impacts related to truck traffic congestion, air emissions, industrial noise to the greatest extent feasible; and creates a project that takes advantage of existing infrastructure, including the proximity to major regional roadways, such as Interstate 10, and other similar infrastructure. However, due to the fact that Alternative 3 does not reduce impacts compared to the proposed project, Alternatives 3 is not considered environmentally superior to the proposed project.

Table 7-9 Comparison of Alternatives and Project

Environmental Topic	Impacts of the Proposed Project	Alternative 1 No Project	Alternative 2 Reduced Intensity	Alternative 3 Industrial Business Park
Aesthetics	Less than Significant	Reduced (No Impact)	Reduced (Less than Significant)	Reduced (Less than Significant)
Air Quality	Less than Significant with Mitigation	Reduced (No Impact)	Reduced (Less than Significant with Mitigation)	Increased (Less than Significant with Mitigation)
Biological Resources	Less than Significant with Mitigation	Reduced (No Impact)	Similar (Less than Significant with Mitigation)	Similar (Less than Significant with Mitigation)
Cultural Resources	Less than Significant with Mitigation	Reduced (No Impact)	Similar (Less than Significant with Mitigation)	Similar (Less than Significant with Mitigation)
Energy	Less than Significant	Reduced (No Impact)	Reduced (Less than Significant)	Increased (Less than Significant)
Geology and Soils	Less than Significant with Mitigation	Reduced (No Impact)	Similar (Less than Significant with Mitigation)	Similar (Less than Significant with Mitigation)
Greenhouse Gas	Significant and Unavoidable	Reduced (No Impact)	Reduced (Less than Significant)	Increased (Significant and Unavoidable)
Hazards and Hazardous Materials	Less than Significant	Reduced (No Impact)	Similar construction; Reduced operational (Less than Significant)	Similar (Less than Significant)
Hydrology and Water Quality	Less than Significant with Mitigation	Reduced (No Impact)	Similar (Less than Significant with Mitigation)	Similar (Less than Significant with Mitigation)
Noise	Less than Significant	Reduced (No Impact)	Reduced (Less than Significant)	Increased (Less than Significant)
Population and Housing	Less than Significant	Reduced (No Impact)	Reduced (Less than Significant)	Similar (Less than Significant)
Public Services	Less than Significant	Reduced (No Impact)	Reduced (Less than Significant)	Similar (Less than Significant)
Transportation	Significant and Unavoidable	Reduced (No Impact)	Reduced (Less than Significant)	Increased (Significant and Unavoidable)
Tribal Cultural Resources	Less than Significant with Mitigation	Reduced (No Impact)	Similar (Less than Significant with Mitigation)	Similar (Less than Significant with Mitigation)
Utilities & Service Systems	Less than Significant	Reduced (No Impact)	Reduced (Less than Significant)	Increased (electricity, natural gas) Similar (water use, sewer, telecommunications) (Less than Significant)

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Chapter 4.0 Environmental Impact Analysis

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Palm Springs Disposal Website

Mission Springs Water District 2019 West Valley Water Reclamation Plant Program DEIR

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Chapter 9.0 Glossary of Terms

AB	Assembly Bill
ACBCI	Agua Caliente Band of Cahuilla Indians
ACHP	Advisory Council on Historic Preservation
ADT	Average Daily Traffic
AFY	Acre-Feet per Year
AQMP	Air Quality Management Plan
ASCE	American Society of Civil Engineers
ASTM	American Society of Testing and Materials
BACM	Best Available Dust Control Measures
BMP	Best Management Practices
BP	Before Present
BTU	British Thermal Unit
CAA	Clean Air Act
CAAQS	California Ambient Air Quality Standards
CAFÉ	Corporate Average Fuel Economy
CalARP	California Accidental Release Prevention Program
CALGreen	California's Green Building Standards
CalEPA	California Environmental Protection Agency
CalEEMod	California Emissions Estimator Model™
CAL FIRE	California Department of Forestry and Fire Protection
CalRecycle	California Department of Resources Recycling and Recovery
Caltrans	California Department of Transportation
CAP	Climate Action Plan
CAPCOA	California Air Pollution Officers Association
CARB	California Air Resources Board
CASQA	California Stormwater Quality Association
CBC	California Building Code
CCR	California Code of Regulations
CdC	Carsitas gravelly sand
CDFW	California Department of Fish and Wildlife
CDGP	Colorado Desert Geomorphic Province
CEC	California Energy Commission
CERS	California Environmental Reporting System
CESA	California Endangered Species Act

CEQA	California Environmental Quality Act
cf	Cubic feet
CFGC	Californian Fish and Game Code
CFR	Code of Federal Regulations
CGP	Construction General Permit
CH_4	Methane
ChC	Carsitas cobbly sand
CHL	California Historical Landmarks
CHP	California Highway Patrol
CIP	Capital Improvement Program
CIWMB	California Integrated Waste Management Board
CkB	Carsitas fine sand
CMA	Congestion Management Agency
CMP	Congestion Management Plan
CMS	Congestion Management System
CNEL	Community Noise Equivalent Level
CO	Carbon Monoxide
CO_2e	Carbon dioxide equivalent
CPUC	California Public Utilities Commission
CRHR	California Register of Historical Resources
CUPA	California Certified Unified Program Agencies
CVAG	Coachella Valley Association of Governments
CVCC	Coachella Valley Conservation Commission
CVEP	Coachella Valley Economic Partnership
CVMC	Coachella Valley Mountain Conservancy
CVMSHCP	Coachella Valley Multiple Species Habitat Conservation Plan
CVSC	Coachella Valley Stormwater Channel
CVSIP	Coachella Valley PM10 State Implementation Plan
CVWD	Coachella Valley Water District
CWA	Clean Water Act
CWA	Coachella Water Authority
CWC	California Water Code
dB	Decibel
dBA	A-weighted decibel
DCE	Desert Community Energy
DEH	Riverside County Department of Environmental Health
DEIR	Draft Environmental Impact Report
DIF	Development Impact Fee
DOF	Department of Finance

DOSH	Division of Occupational Safety and Health
DOT	Department of Transportation
DPR	Department of Pesticide Regulation
DTSC	Department of Toxic Substances Control
DWA	Desert Water Agency
DWR	California Department of Water Resources
DWQ	Department of Water Quality
ECHO	Enforcement and Compliance History Online
EIA	Energy Information Administration
EIC	Eastern Information Center
EIR	Environmental Impact Report
EISA	Energy Independence and Security Act of 2007
EMFAC	Emissions Factors Model
EO	Executive Order
EOC	Emergency Operations Center
EOP	Emergency Operations Plan
EPA	Environmental Protection Agency
EPCRA	Emergency Planning and Community Right-To-Know Act
EPO	Environmental Protection and Oversight Division
ESA	Environmental Site Assessment
FEMA	Federal Emergency Management Agency
FESA	Federal Endangered Species Act
FC	Footcandle
FHSZ	Fire Hazard Severity Zones
FHWA	Federal Highway Administration
FICON	Federal Interagency Committee on Noise
FIRM	Flood Insurance Rate Map
FMMP	Farmland Mapping and Monitoring Program
FTA	Federal Transit Administration
GCC	Global Climate Change
GHG	Greenhouse Gas
GIS	Geographic Information Systems
GO	General Order
GP	General Plan
GPCD	Gallons Per Capita Day
GPS	Global Positioning System
GRF	Groundwater Replenishment Facility
GWh	Gigawatt Hours
HCP	Habitat Conservation Plans

HCFC	Hydrochlorofluorocarbons
HCM	Highway Capacity Manual
HFC	Hydrofluorocarbons
HMBP	Hazardous Materials Business Plan Program
Hp	Horsepower
HSC	Health and Safety Code
HVAC	Heating Ventilation and Air Conditioning
HWCL	Hazardous Waste Control Law
HWWTP	Horton Wastewater Treatment Plant
I-10	Interstate 10
IID	Imperial Irrigation District
ISO	Independent System Operator
ITE	Institute of Transportation Engineers
IWA	Indio Water Authority
IWMP	Integrated Waste Management Plan
kW	kiloWatt
Leq	Equivalent Sound Level
LDMF	Local Development Mitigation Fee
LHMP	Local Hazard Mitigation Plan
LID	Low Impact Development
LOS	Level of Service
LRA	Local Responsibility Area
LST	Local Significance Threshold
LUST	Leaking Underground Storage Tank
MBTA	Migratory Bird Treaty Act
MC	Municipal Code
MGD	Million Gallons Per Day
MLD	Most Likely Descendant
MMI	Modern Mercalli Intensity
MMRP	Mitigation Monitoring and Reporting Program
MMT	Million Metric Tones
$MMTCO_2e$	Million Metric Tones of Carbon Dioxide emissions
MSL	Mean Sea Level
MSWD	Mission Springs Water District
MS4 Permit	Whitewater River Region Municipal Separate Storm Sewer System Permit
$MTCO_2e$	Metric Tones of Carbon Dioxide emissions
MUTCD	Manual on Uniform Traffic Control Devices
MW	Megawatt
NAAQS	National Ambient Air Quality Standards

NAHC	Native American Heritage Commission
NFIP	National Flood Insurance Program
NHPA	National Historic Preservation Act
NHTSA	National Highway Traffic Safety Administration
NPDES	National Pollutant Discharge Elimination System
NPPA	Native Plant Protection Act
N_2O	Nitrous Oxide
NO_2	Nitrogen Dioxide
NOA	Notice of Availability
NOAA	National Oceanic and Atmosphere Administration
NOC	Notice of Completion
NOP	Notice of Preparation
NO_X	Nitrogen Oxide
NRHP	National Register of Historic Places
O_3	Ozone
OEHHA	Office of Environmental Health Hazard Assessment
OES	Office of Emergency Services
O&M	Operations and Maintenance
OPR	Office of Planning and Research
OSHA	Occupational Safety and Health Administration
Pb	Lead
PCE	Passenger Car Equivalent
PDF	Project Design Feature
PEL	Permissible Exposure Limit
PFC	perfluorocarbons
PHMSA	Pipeline and Hazardous Materials Safety Administration
PM_{10} / $PM_{2.5}$	Particulate Matter (10 Microns / 2.5 Microns)
PPV	Peak Particle Velocity
PRC	Public Resources Code
PSGP	Palm Springs General Plan
PSPD	Palm Springs Police Department
PWS	Public Water System
PV	Photovoltaic
RCDWR	Riverside County Department of Waste Resources
RCEM	Road Construction Emissions Model
RCFC&WCD	Riverside County Flood Control and Water Conservation District
RCFD	Riverside County Fire Department
RCRA	Resource Conservation and Recovery Act
RCTC	Riverside County Transportation Commission

Region 7	State Water Resources Control Board Colorado River Basin Region
RFS	Renewable Fuel Standard
RHNA	Regional Housing Needs Allocation
RIVCOM	Riverside County Model
RIVTAM	Riverside Transportation Analysis Model
RMS	Root Mean Squared
ROG	Reactive Organic Gas
ROW	Right-of-Way
RTIP	Regional Transportation Improvement Program
RTP	Regional Transportation Plan
RUWMP	Regional Urban Water Management Plan
RWQCB	Regional Water Quality Control Board
RWRF	Regional Water Reclamation Facility
SB	Senate Bill
SCAB	South Coast Air Basin
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCE	Southern California Edison
SCS	Sustainable Communities Strategy
SDS	Safety Data Sheets
SDWA	Safe Drinking Water Act
SED	Socioeconomic data
SF	Square Feet
SF_6	Sulfur Hexafluoride
SFHA	Special Flood Hazard Areas
SGMA	Sustainable Groundwater Management Act
SHMA	Seismic Hazards Mapping Act
SHPO	State Historic Preservation Officer
SIP	State Implementation Plan
SO_2	Sulfur Dioxide
SoCalGas	Southern California Gas Company (The Gas Company)
SOX	Sulfur Oxides
SP	Service Population
SP	Specific Plan
SRA	Source Receptor Areas
SRA	State Responsibility Area
SSAB	Salton Sea Air Basin
SWP	State Water Project
SWPPP	Storm Water Pollution Prevention Plan

SWRCB	State Water Resources Control Board
TAZ	Traffic Analysis Zone
TCR	Tribal Cultural Resources
TDM	Transportation Demand Management
TIA	Traffic Impact Analysis
THPO	Tribal Historic Preservation Officer
tpd	Tons per day
TRI	Toxics Release Inventory
TUMF	Transportation Uniform Mitigation Fee
UBC	Uniform Building Code
UWMP	Urban Water Management Plan
USACE	United States Army Corps of Engineers
USDA	United States Department of Agriculture
USEPA	United States Environmental Protection Agency
USFWS	United States Fish and Wildlife Service
USGS	United States Geological Survey
UWMPA	Urban Water Management Planning Act
VHFHSZ	Very High Fire Hazard Severity Zone
VMT	Vehicle Miles Traveled
VOC	Volatile Organic Compounds
VPH	Vehicle per hour
WDR	Waste Discharge Requirements
WECS	Wind Energy Convection System
WEO	Wind Energy Overlay
WQMP	Water Quality Management Plan
WRPs	Water Reclamation Plants
WSA	Water Supply Assessment
WSCP	Water Shortage Contingency Plan
WSV	Water Supply Verification