



INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

ARMTEC EXPANSION MASTER PLAN

Environmental Assessment 25-01
Conditional Use Permit 389
Architectural Review 25-02

Applicant:

Armtec Defense Products Co.
85901 Avenue 53
Coachella, CA 92236

Lead Agency:

City of Coachella
53990 Enterprise Way
Coachella, CA 92236

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CITY OF COACHELLA
CEQA Environmental Checklist & Environmental Assessment

	<p>INITIAL STUDY/MITIGATED NEGATIVE DECLARATION</p>
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Project Title:	Armtec Expansion Master Plan
Case No.	EA 25-01, CUP 389, AR 25-02
Assessor's Parcel No.	778-420-013, 778-390-008
Lead Agency Name and Address:	City of Coachella – Planning Division 53990 Enterprise Way Coachella, California 92236
Project Location:	Armtec Defense Technologies 85901 Avenue 53 Coachella, California 92236
Project Sponsor's Name and Address:	Armtec Defense Products Co. 85901 Avenue 53 Coachella, CA 92236
General Plan Designation(s):	Urban Employment, Industrial District
Zoning:	Urban Employment (U-E), Heavy Industrial (M-H)
Contact Person:	Adrian Moreno, Associate Planner amoreno@coachella.org
Phone Number:	760-398-3502 Ext: 118
Date Prepared	April 21, 2025

PROJECT DESCRIPTION

Purpose of the Initial Study:

The City of Coachella, as Lead Agency under the California Environmental Quality Act (CEQA), is preparing an Initial Study (IS) for the proposed Armtec Expansion Master Plan Project, referred to as “the Project” or “the proposed Project” in this document.

The Initial Study has been prepared in accordance with CEQA, Public Resources Code Section 21000 et seq., State CEQA Guidelines. Section 15063(c) of the CEQA Guidelines defines an Initial Study as the proper preliminary method of analyzing the potential environmental consequences of a project. To paraphrase from this Section, the relevant purposes of an Initial Study are:

1. To provide the Lead Agency with the necessary information to decide whether to prepare an Environmental Impact Report (EIR) or a Mitigated Negative Declaration (MND);
2. To enable the Lead Agency to modify a project, mitigating adverse impacts, thus avoiding the need to prepare an EIR; and
3. To provide sufficient technical analysis of the environmental effects of a project to permit a judgment based on the record as a whole, that the environmental effects of a project have been adequately mitigated.

Project Location:

Armtec Defense Technologies (Armtec) is located at 85901 Avenue 53 in Coachella, Riverside County, CA. (Exhibits 1 and 2). The Project site consists of two parcels totaling approximately 52.65 acres in size, identified by assessor's parcel numbers (APNs) 778-420-013 (14.96 acres) and 778-390-008 (37.69 acres).

The northern parcel is designated “Urban Employment” on the 2035 General Plan land use map and is zoned for “Urban Employment” (U-E). The southern parcel is designated “Industrial District” on the General Plan land use map and zoned for “Heavy Industrial (M-H).”

Existing Conditions

Armtec's manufactures state of the art combustible ordinance products. Its existing operations include production facilities, research and development, and storage warehouses. Armtec's existing industrial and manufacturing operations are located on the southern parcel (APN: 778-390-008). The northern parcel (APN: 778-420-013) contains a ±33,900 SF ground mounted solar grid located on the eastern half of the parcel. The solar facility is connected to equipment on the southern parcel, including seven solar covered parking canopies.

Project Description:

The proposed Project is Phase 2 and Phase 3 of the three phase Armtec Expansion Master Plan (Exhibit 3: Project Master Plan). Phase 1 of the Master Plan, which is not part of the Project, was the construction of the solar grid located on the northern parcel and seven solar parking canopies. Phase 1 was completed in early 2025.

Phase 2 includes the construction of a new 15,000 SF storage warehouse, a $\pm 73,200$ truck staging area and 9,900 SF retention basin on the northern parcel (Exhibit 4), and a new 3,000 SF research and development (R&D) and production facility and two retention basins totaling 65,750 SF on the southern parcel (Exhibit 5). Phase 2 elevations show the storage warehouse building with a maximum building height of 31 feet 6.5 inches to top of ridge, and the R&D and production facility with a maximum building height of 29 feet 5 inches to top of ridge. On the northern parcel, an all-season fire access road will be constructed on the north and east side of the storage warehouse building. On the southern parcel, an all-season fire access road will extend approximately 400 feet north from an existing on-site dirt road towards the proposed R&D building. Phase 2 includes an Architectural Review (AR 25-02) of all proposed Phase 2 structures and the three retention basins, and a Conditional Use Permit (CUP 389) to allow the storage warehouse building and truck staging area on the northern parcel zoned U-E, and to allow the R&D and production building on the southern parcel zoned M-H.

Phase 3 includes the construction of a new 15,000 SF production facility, a new 15,000 SF storage warehouse, two new 900 SF storage structures, and a 6,000 SF expansion of an existing storage warehouse, all located on the southern parcel. The timing for construction of Phase 3 is currently undetermined. Future site plans for the Phase 3 portion of the Project will be required to undergo a separate Architectural Review prior to approval, and a CUP will be required to allow the production facility on the southern parcel zoned M-H.

In total, the Project proposes 37,800 SF in new storage facilities, 3,000 SF in new research and development/small production facilities, 15,000 SF in new production facilities, a $\pm 73,200$ SF truck staging area, and three retention basins. The operation of the new buildings will be managed by existing staff, and the Project does not include plans to hire additional employees.

Access to the Project will be provided via the Armtec main entrance, which is an existing full access driveway on Tyler Street, south of Avenue 53. On-site parking is currently provided by existing Armtec facilities. In addition to the proposed site improvements, off-site improvements include the widening of Tyler Street which includes road expansion, new asphalt, median and landscaping improvements, curb, gutter, and a separated sidewalk between Avenue 53 and Tyler Lane. Tyler Street will be widened by 19 feet to the east from Avenue 53 to the southern Armtec property line, covering approximately 1,830 linear feet.

Below is a brief description of the proposed operational activities:

Storage Warehouses: The storage warehouses are designed to house finished goods which consist of a Hazard Class 1.4 explosive material, which present no significant blast hazard. These are explosives that contain no more than 0.9 oz. (25 g) of a detonating material and where the effects are mainly confined to the package, and no projection fragments of substantial size or range are expected. Specifically, these warehouses will store empty combustible cartridge cases of various sizes with no propellant. The storage warehouse will remain unoccupied except when goods are moved in and out of the structure.

R&D Facilities: The R&D facility will be used to develop small quantities of combustible materials in various configurations. Hazardous materials will consist primarily of nitro-cellulose. No hazardous materials will be stored in the building. Occupancy of the Phase 2, 3,000 SF building will be strictly regulated, and occupancy is expected to be limited to approximately 8 persons. Ancillary storage containers measuring 40' x 8' x 8' may be placed in proximity to the Phase 2 R&D facility, however these storage containers would be for non-hazardous materials including tooling, spare parts, and packing materials.

Production Facilities: The production facility produces a variety of combustible ordnance products. These facilities include or contain research and development equipment, chemical evaluation laboratories, engineering services, quality control operations, high volume production, and safety and security services.

Safety protocols established by the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) require the proposed buildings be constructed as a Type 4 magazine which consist of formed and poured concrete construction with reinforced roofs (ATF 27 CFR § 555.203 and 27 CFR § 555.210). The physical security of proposed facilities and access points shall be in accordance with the Department of Defense Manual (DoDM 5100.76) specific to AA&E security (Arms, Ammunition, and Explosives). The proposed buildings will be placed beyond the required safety distances for Hazard Class (HC) 1.4 "low explosives," which require an inhabited-building distance (IBD) of 100 ft from inhabited buildings or public traffic routes.¹

¹ Safety regulations per DoD 4145.26-M, DOD 6055.09-STD, DOD 5100.76M, California Code of Regulations, Title 8, Section 5189, Bureau of Alcohol Tobacco, Firearms and Explosives (ATF), Title 27 Part 555 & Title 29, Code of Federal Regulations, 1910.109

Surrounding Land Uses

Land uses nearby and adjacent to the site include:

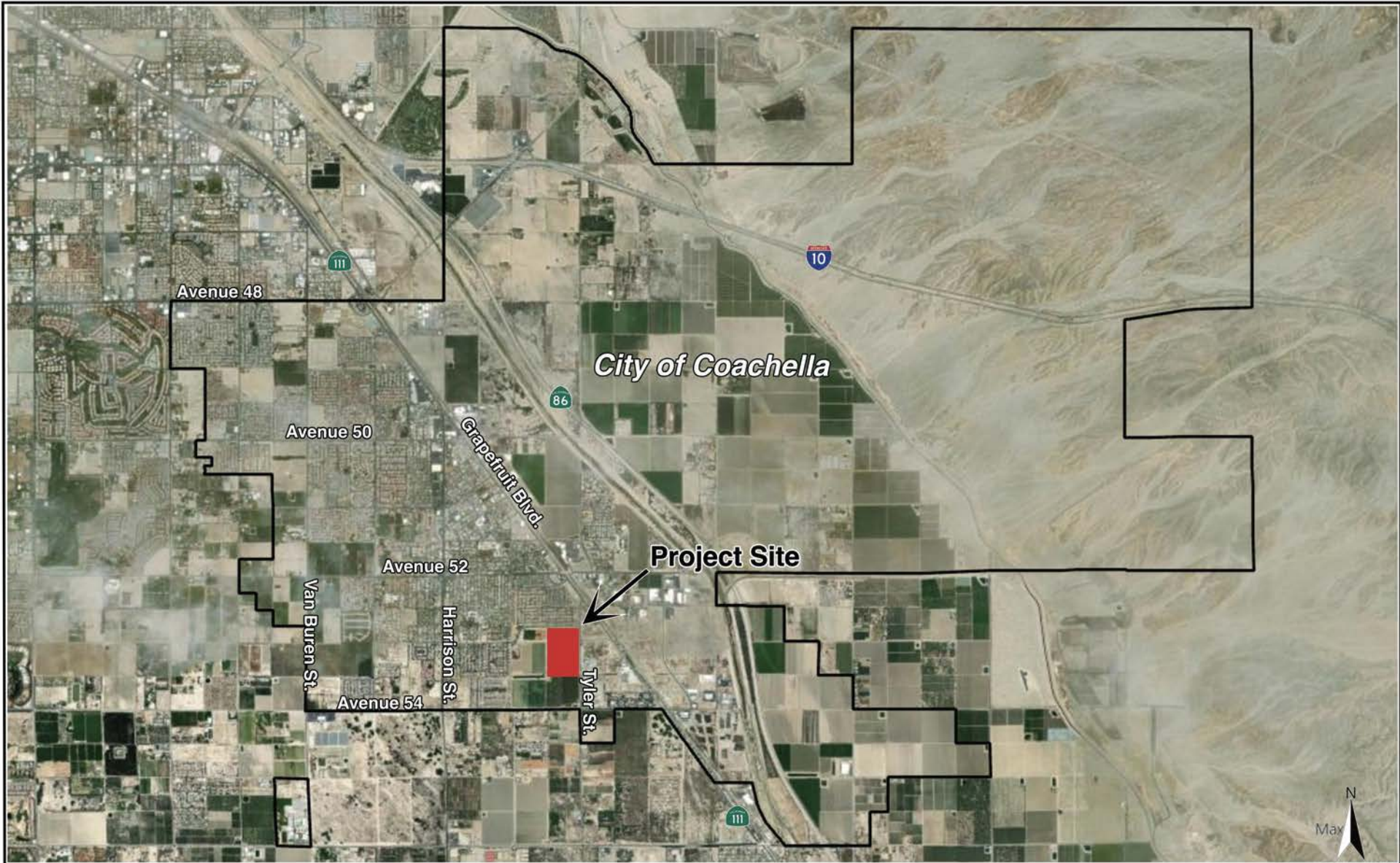
North: Avenue 53, single-family residential.

South: Agricultural field

West: Soccer field, agricultural field.

East: Tyler Street, vacant land, single family residential and mobile homes (mobile home park).

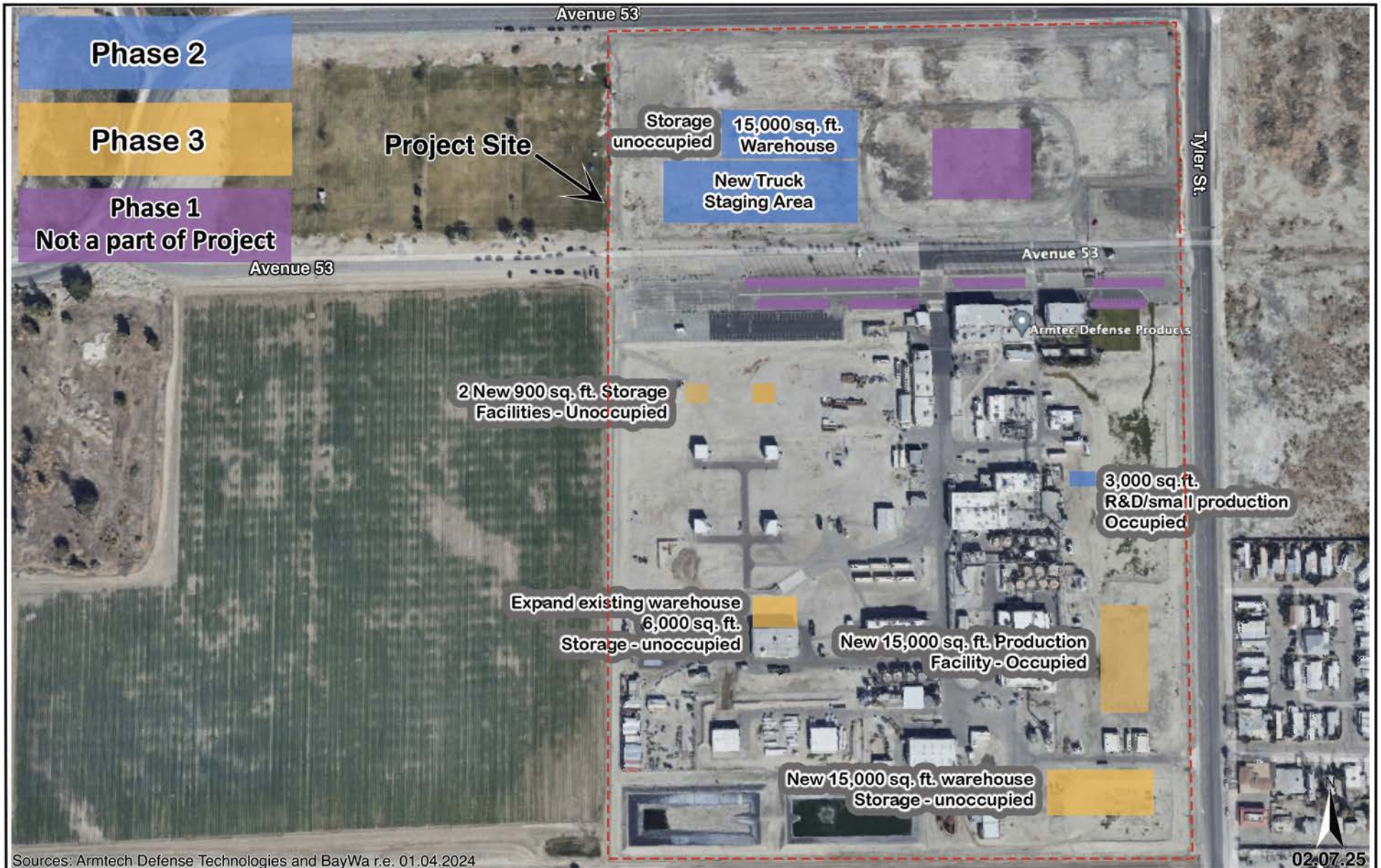
Other public agencies whose approval is required: N/A



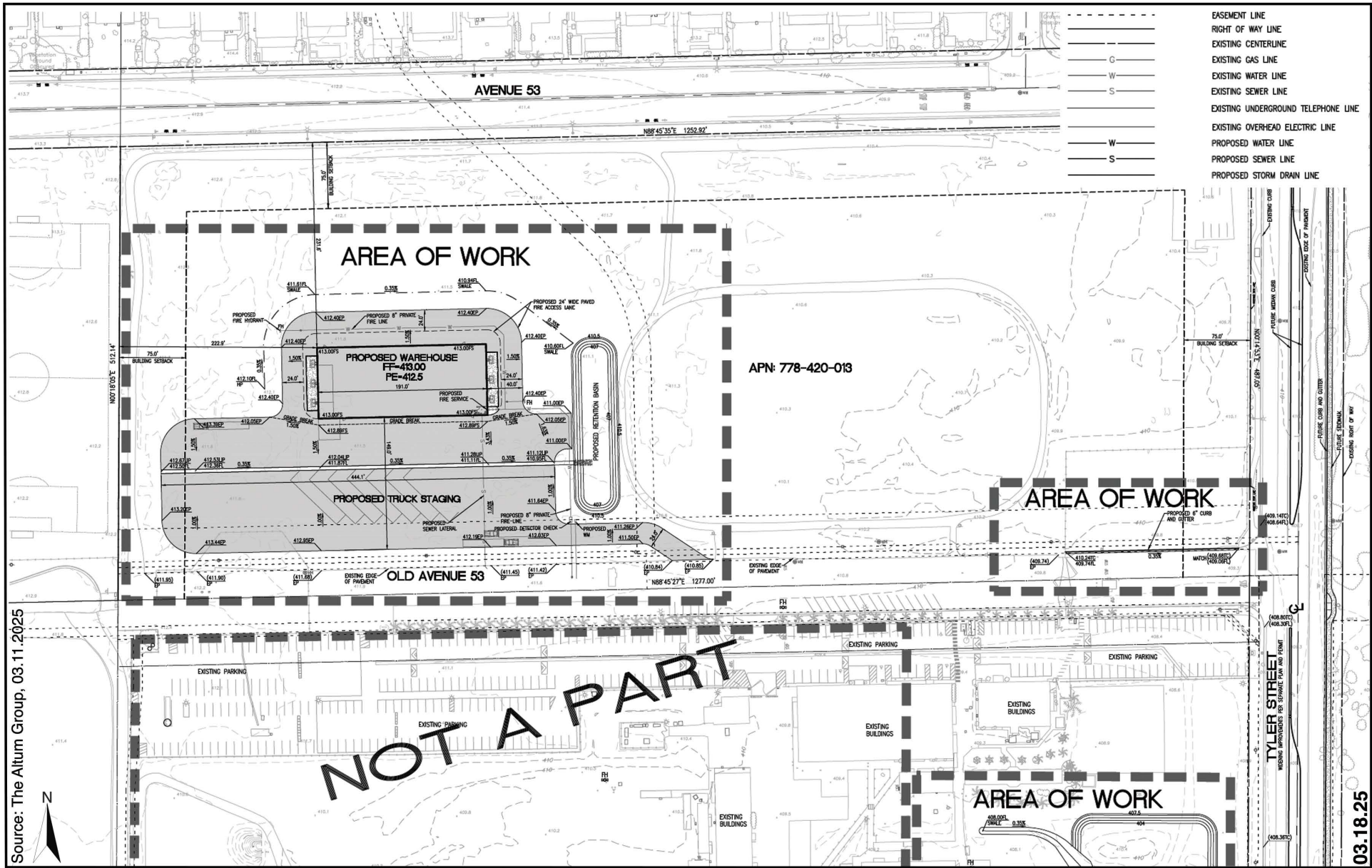
Sources: ESRI, 08.2024.

02.07.25





Sources: Armtech Defense Technologies and BayWa r.e. 01.04.2024



- EASEMENT LINE
- RIGHT OF WAY LINE
- EXISTING CENTERLINE
- G ----- EXISTING GAS LINE
- W ----- EXISTING WATER LINE
- S ----- EXISTING SEWER LINE
- EXISTING UNDERGROUND TELEPHONE LINE
- EXISTING OVERHEAD ELECTRIC LINE
- W ----- PROPOSED WATER LINE
- S ----- PROPOSED SEWER LINE
- PROPOSED STORM DRAIN LINE

Source: The Altum Group, 03.11.2025

03.18.25



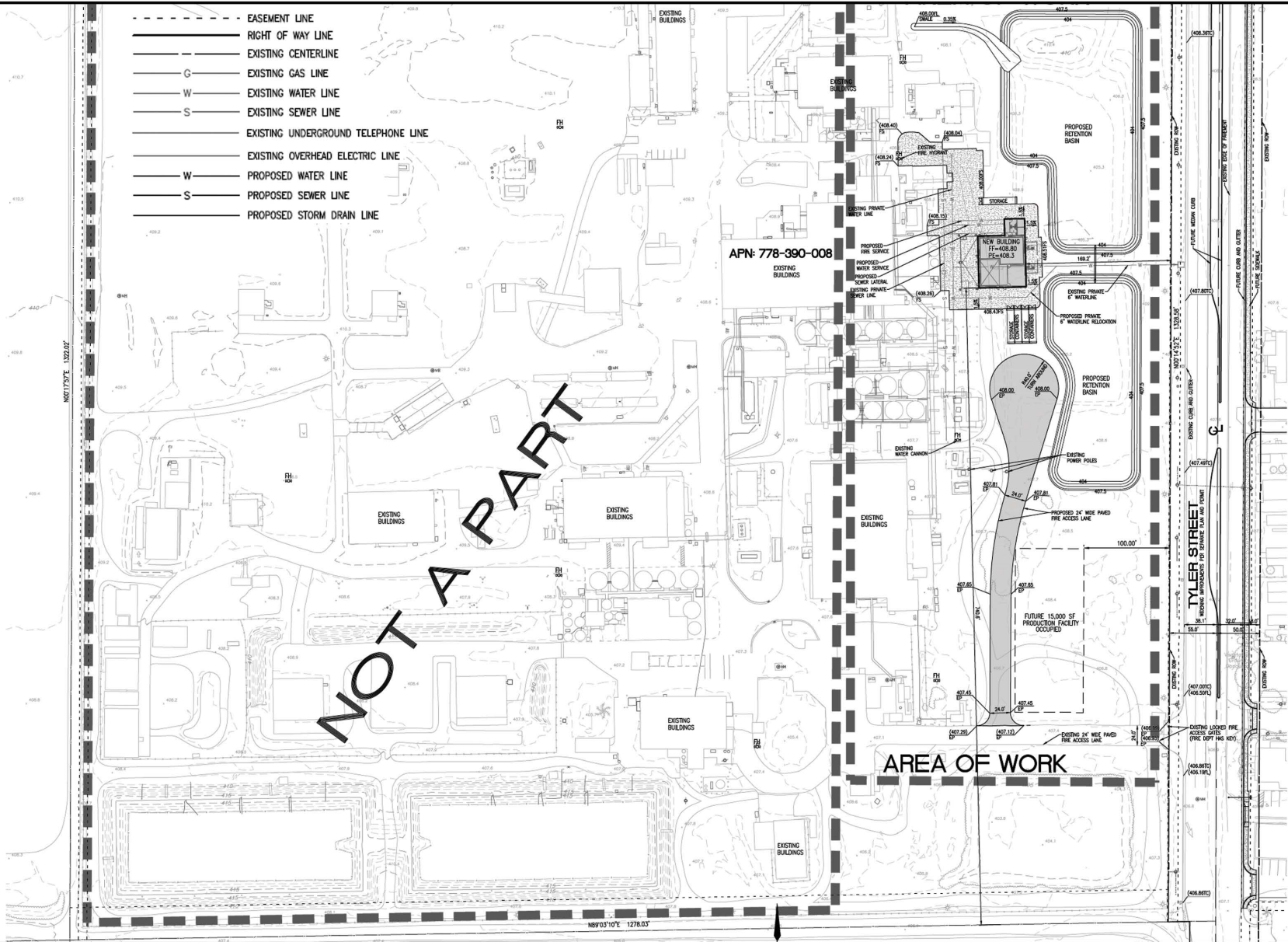
**Phase 2 Preliminary Site Plan
Northern Parcel
Armtex Expansion Master Plan
Coachella, California**

**Exhibit
4**

Source: The Altum Group, 03.11.2025.



- - - - - EASEMENT LINE
- ==== RIGHT OF WAY LINE
- — — — EXISTING CENTERLINE
- G — — EXISTING GAS LINE
- W — — EXISTING WATER LINE
- S — — EXISTING SEWER LINE
- — — — EXISTING UNDERGROUND TELEPHONE LINE
- — — — EXISTING OVERHEAD ELECTRIC LINE
- W — — PROPOSED WATER LINE
- S — — PROPOSED SEWER LINE
- — — — PROPOSED STORM DRAIN LINE



NOT A PART

**Phase 2 Preliminary Site Plan
Southern Parcel
Armtec Expansion Master Plan
Coachella, California**

03.18.25

Exhibit

5

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

	Aesthetics		Agriculture and Forestry Resources		Air Quality
	Biological Resources		Cultural Resources		Energy
	Geology /Soils		Greenhouse Gas Emissions		Hazards & Hazardous Materials
	Hydrology / Water Quality		Land Use / Planning		Mineral Resources
	Noise		Population / Housing		Public Services
	Recreation		Transportation		Tribal Cultural Resources
	Utilities/Service Systems		Wildfire		Mandatory Findings of Significance

DETERMINATION: (To be completed by the Lead Agency) On the basis of this initial evaluation:

	I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
X	I find that although the proposed project could have a significant effect on the environment there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
	I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
	I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
	I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Adrian Moreno

Adrian Moreno, Associate Planner
City of Coachella

4-21-25

Date

EVALUATION OF ENVIRONMENTAL IMPACTS:

- 1) A brief explanation is required for all answers except “No Impact” answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A “No Impact” answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A “No Impact” answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
- 2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
- 3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. “Potentially Significant Impact” is appropriate if there is substantial evidence that an effect may be significant. If there are one or more “Potentially Significant Impact” entries when the determination is made, an EIR is required.
- 4) “Negative Declaration: Less Than Significant With Mitigation Incorporated” applies where the incorporation of mitigation measures has reduced an effect from “Potentially Significant Impact” to a “Less Than Significant Impact.” The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from “Earlier Analyses,” as described in (5) below, may be cross referenced).
- 5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:
 - a) Earlier Analysis Used. Identify and state where they are available for review.
 - b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c) Mitigation Measures. For effects that are “Less than Significant with Mitigation Measures Incorporated,” describe the mitigation measures, which were incorporated or refined from the earlier document and the extent to which they address site specific conditions for the project.
- 6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances).

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

- 7) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
- 8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.
- 9) The explanation of each issue should identify:
 - a) The significance criteria or threshold, if any, used to evaluate each question; and
 - b) The mitigation measure identified, if any, to reduce the impacts to less than significance.

I. AESTHETICS Except as provided in Public Resources Code Section 21099, would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Have a substantial adverse effect on a scenic vista?			X	
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?				X
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?			X	
d) Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?			X	

Setting

The Project site is located in the Coachella Valley, a low-lying and relatively flat desert valley bounded by the Little San Bernardino Mountains on the north and northeast, and the Santa Rosa Mountain to the west and southwest. The San Jacinto Mountain range is further west; however, views are obstructed by the intervening Santa Rosa Mountains and largely diminished due to distance from the site. The mountains and hills have a significant rise over the valley floor. The Salton Sea, at an elevation of approximately 200 feet below sea level, is located in the southeast portion of the valley. The Salton Sea is located approximately 15 miles southeast of the project site.

Currently, the subject site is developed with the existing Armtex facilities and contains no scenic resources. The Project site generally has distant views of the middle and upper elevations of the surrounding mountains. Middle and foreground views from the site include single family residential to the north and southeast, vacant lands to the northeast, and soccer and agricultural fields to the west and south.

Development of the Project will result in the construction of new buildings among existing on-site structures, which may impact surrounding views as discussed below.

Discussion of Impacts

- a) **Less than Significant Impact.** Scenic vistas are generally described in two ways: panoramic views (visual access to a large geographic area, for which the field of view can be wide and extend into the distance) and focal views (visual access to a particular object, scene, or feature of interest).

Construction Impacts on Scenic Vistas

Construction of the proposed Project would require the use of heavy equipment for grading, paving and excavation. Standard construction methods would be used for the construction of the proposed buildings. Construction activities would be visible from the surrounding streets and residential developments. Equipment moving on the site will not create a permanent obstruction, and existing views would remain consistent with those currently experienced on the site during site preparation. When building construction is initiated, the vertical construction would result in the blocking of views consistent with that described below.

Permanent Impacts to Scenic Vistas

The Project site is located in area of Coachella characterized by scattered developed and undeveloped lands that support a mix of residential, industrial, agricultural and some commercial uses. The Project site is currently developed with the existing Armtec facilities and bounded by Avenue 53 and single-family residential to the north, an agricultural field to the south, a soccer field and agricultural field to the west, and Tyler Street, vacant land and a mobile home park to the east. Existing Armtec facilities include industrial buildings and structures not exceeding 35 feet in height (per zoning code), and a line of palm trees adjacent to the on-site parking lot that may exceed 35 feet.

For Phase 2, the storage warehouse building proposes a maximum building height of 31 feet 6.5 inches to top of ridge, and the R&D and production facility proposes a maximum building height of 29 feet 5 inches to top of ridge.

Phase 3 includes the construction of a new 15,000 SF production facility, a new 15,000 SF storage warehouse, two new 900 SF storage structures, and a 6,000 SF expansion of an existing storage warehouse. Although precise plans have not been prepared for Phase 3, future development shall comply with Zoning Code Sections 17.32.030 – Property Development Standards for the M-H zone.

Views to the North and Northeast

From the subject property, views of the San Bernardino Mountains are to the north and northeast, with the Project site located approximately 6.6 miles southwest of the San Bernardino Mountain foothills. For properties and travelers to the north and east of the site, the proposed Project would not impact northerly views of the San Bernardino Mountains as the Project occurs outside the line of sight.

Lands to the west include a soccer field and agricultural field, and lands to the south include agricultural fields. Viewers looking north, east and northeast toward the Project site currently experience partially obstructed views of the San Bernardino Mountain foothills due to intervening residential development and the existing Armtec facilities; however, views of the middle and upper mountain elevations largely remain. Development of the Project would introduce new buildings on a site currently occupied by similar structures and structure heights. The Project may increase the current level of visual obstruction of the lower mountain elevations but will not significantly impact the middle and upper elevations of the scenic vista due to the distance (240 feet) to the nearest proposed structure (Phase 2 storage warehouse) from the western property line. Impacts to scenic vistas would be less than significant because these views to the north and northwest are already obstructed by landscaping and existing development.



GoogleEarth 2025, Imagery date 11/2022: Views from soccer field looking east/northeast towards Project site's northern parcel and San Bernardino Mountains.



GoogleEarth 2025, Imagery date 7/2023: Views from Avenue 54 looking north towards Project site and San Bernardino Mountains, agricultural fields intervening.

Views to the South and Southwest

From the Project site, views of the Santa Rosa Mountains are to the south and southwest, with the site located approximately 6.7 miles northeast of the Santa Rosa Mountain foothills. For properties to the south and west of the site, the proposed Project would not impact southerly views of the Santa Rosa Mountains as the Project occurs outside the line of sight.

Lands to the north and northeast include Avenue 53, single family residential development, and Tyler Street. Viewers looking south and southwest toward the Project site currently experience partially obstructed views of the lower and middle views of the Santa Rosa Mountains; however, upper elevations are still visible. Development of the Project would introduce new buildings on a site currently occupied by similar structures and structure heights. The Project may increase the current level of visual obstruction to the lower and middle mountain elevations but will not significantly impact the upper elevations of the scenic vista due to the distance (230 feet) to the nearest proposed structure (Phase 2 storage warehouse) from the northern property line. Impacts to scenic vistas would be less than significant because these views to the south are already obstructed by landscaping and existing development.



GoogleEarth 2025, Imagery date 7/2023: Views from the corner of Avenue 53 and Tyler Street looking southwest towards the Project site and Santa Rosa Mountains.

Views to the Southeast

There are no prominent scenic views to the southeast because there are no mountains to the southeast of the site. Currently, visitors of the soccer fields and workers on the agricultural fields, which occur west of the site, have no scenic vistas to the southeast, and intervening development, including existing Armtec facilities, partially block the visual field. Overall, impacts would be less than significant because no scenic vistas occur to the southeast.



GoogleEarth 2025, Imagery date 11/2022: Views from the soccer field looking southeast towards the Project site.

Views to the West and Northwest

From the Project site, distant views of the Santa Rosa Mountains are about 6.7 miles and to the west. The San Jacinto Mountains are located 23.5 miles west/northwest of the site; however, views of this range are largely obstructed by the intervening Santa Rosa Mountains and diminished by distance. There are no prominent scenic views to the northwest. For properties to the west, south and north of the site, the proposed Project would not impact westerly views of the Santa Rosa Mountains as the Project occurs outside the line of sight.

From the Project site, views of the lower elevations of the mountains to the west are blocked by intervening development on the valley floor. However, middle and upper slopes of the mountains are visible above these buildings, although often diminished due to distance and air pollution. Travelers on Tyler looking westerly would experience a similar level of view obstruction, and although the proposed structures will be visible, the ridgelines of the Santa Rosa Mountains will remain visible for those traveling along this roadway.



GoogleEarth 2025, Imagery date 7/2023: Views from Tyler Street looking west towards the Project site.

The mobile home park located east of the Project site and Tyler Street currently experiences largely obstructed westerly views of the lower and middle mountain elevations due to the existing Armtec facilities. Views of the proposed new structures will be mostly obstructed by existing Armtec facilities, and although the rooflines of the proposed structures may be visible to viewers from the west, the ridgelines of the Santa Rosa Mountains will remain visible similar to existing conditions. As a result, impacts will be less than significant.



GoogleEarth 2025, Imagery Date 7/2023: Views from Tyler Street and mobile home park looking northwest towards the Project site.



GoogleEarth 2025, Imagery Date 7/2023: Views from Tyler Street and mobile home park looking west towards the Project site and Santa Rosa Mountains.

Conclusion

The proposed Project will require architectural review and approval (AR 25-02) to ensure the proposed structures are architecturally treated to enhance the site's appearance. Buildout of the proposed Project would result in limited new obstruction of surrounding views and is comparable to existing industrial structures on-site with regard to mass and height. As scenic vistas from the public realm remain largely intact, impacts are considered less than significant (CEQA Guidelines § 15064(b)).

- b) No Impact.** The Project site is not located within a state scenic highway or locally designated scenic corridor, and also does not contain scenic resources, such as rock outcroppings or trees. No impact is expected.
- c) Less than Significant Impact.** The Project site's northern parcel is largely vacant except for the recently constructed Phase 1 solar grid, and the southern parcel is developed with existing Armttec facilities. The mass and scale of the existing, allowed and proposed structures are comparable with regards to visual impacts. Project development shall comply with the City of Coachella General Plan policies for Urban Employment Centers and Industrial Districts, and shall also comply with Zoning Code Sections 17.16.030, and 17.32.030 – Property Development Standards of the U-E zone and M-H zone, respectively (see Section XI. Land Use and Planning for further discussion of General Plan and Zoning Code compliance). Phase 2 and future Phase 3 plans will undergo architectural review prior to approval to ensure high-quality building design to minimize any visual degradation of the site. On that basis, the proposed Project is consistent with City-adopted regulations and will not conflict with applicable zoning and other regulations governing scenic quality.
- d) Less than Significant Impact.** The Project is located in an urban environment that includes existing sources of light and glare associated with the on-site Armttec facilities and nearby land uses. Nearby sources of light include exterior lighting on residential buildings, street lighting on the adjacent Tyler Street and Avenue 53, passing vehicle headlights.

Short-Term (Construction-Related) Impacts

During the construction phase, there would be no need to add security lighting for construction areas or construction staging areas, because nighttime construction is not anticipated. Therefore, impacts related to new sources of light and glare during construction would be less than significant.

Long-Term (Operations-Related) Impacts

The ultimate development of new industrial buildings on the site can be expected to generate increased levels of light and glare from interior and exterior building lighting, safety and security lighting; however, it would not require use of high intensity outdoor lighting. Lighting and glare levels are not expected to exceed typical levels that currently exist on-site and within the surrounding urban environment and will be regulated by City lighting standards. The proposed development will abide by the city's standards prohibiting reflective surfaces and spillage of light onto adjacent properties. The City will review and approve the lighting plan prior to construction, which will ensure that lighting and glare levels are at acceptable levels. Impacts will be less than significant.

Mitigation Measures: None

Monitoring: None

Source: City of Coachella Municipal Code; City of Coachella General Plan; GoogleEarth.

II. AGRICULTURE RESOURCES

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board.

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
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?				X
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?				X
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?				X
d) Result in the loss of forest land or conversion of forest land to non-forest use?				X
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?				X

Setting

The Project site consists of two parcels currently developed with Armtec facilities. The northern parcel is designated “Urban Employment” on the 2035 General Plan land use map and is zoned for “Urban Employment” (U-E). The southern parcel is designated “Industrial District” on the General Plan land use map and zoned for “Heavy Industrial (M-H).” According to available historical information, the subject property consisted of agricultural lands since at least 1949 through the late 1960’s. By 1972 the site had been partially developed with the current Armtec facility. According to the California Important Farmland Finder, the subject property’s southern parcel is designated as “Urban and Built Up” land, and the northern parcel is designed “Farmland of Local Importance.” State-designated Prime Farmland lies immediately west and south of the site and is actively used for agriculture. There are no forest lands on or within the immediate vicinity of the Project.

Discussion of Impacts

a-e) No Impact.

Prime Farmland: No prime or unique farmland, or farmland of statewide importance exists within the Project site. State-designated Prime Farmland lies immediately west and south of the site and is actively used for agriculture. These farmlands operate independently and are unaffected by the existing Armtec facilities and the proposed expansion. The state identifies the northern parcel of the project site as being “Farmland of Local Importance,” however the site is not zoned or otherwise intended for agricultural uses. The northern parcel in question is designated “Urban Employment” on the 2035 General Plan land use map and is zoned for “Urban Employment” (U-E). According to the Phase I ESA (Appendix E), the project site has not been in agricultural use since at least the late 1960’s, after which the property began to develop with the current Armtec facilities. As such, the Project would not convert farmland to non-agricultural use. No impacts would occur, and no mitigation measures are required.

Williamson Act: The project site is designated for urban uses in the General Plan and Zoning Ordinance. According to California Williamson Act Enrollment Finder provided by the California Department of Conservation, the subject property is not actively enrolled in a Williamson Act contract. Furthermore, the Riverside County Clerk-Recorders website lists the northern parcel as CT (commercial land) and the southern parcel as CT (light industrial). No land on the Project site is under a Williamson Act contract or listed as an agricultural preserve with the County Clerk-Recorders office. Therefore, the Project would not conflict with any zoning for agricultural uses or a Williamson Act Contract. No impacts would occur, and no mitigation measures are required.

Forest Land: The Project site is located on the desert floor, currently zoned as Urban Employment and Heavy Industrial. The subject site does not contain forest land, timberland or timberland zoned for timberland production. Therefore, the Project would not rezone forest land or timberland as defined by the Public Resources Code and Government Code. No impacts would occur, and no mitigation measures are required.

Mitigation Measures: None.

Monitoring: None.

Source: California Important Farmland Finder, California Department of Conservation. <https://maps.conservation.ca.gov/DLRP/CIFF/>. Accessed August 2024; Phase I Environmental Site Assessment, Armtec Defense Technologies, prepared by Northgate Environmental Management, Inc. August 2024; California Williamson Act Enrollment Finder, California Department of Conservation. <https://gis.conservation.ca.gov/portal/home/webmap/viewer.html?webmap=18f7488c0a9d4d299f5e9c33b312f312>. Accessed April 2025; Riverside County Assessor - County Clerk - Recorder > Property Search > Valuation. (2025). Publicaccessnow.com. <https://ca-riverside-acr.publicaccessnow.com/PropertySearch/Valuation.aspx?p=778420013&a=778420013&m=>. Accessed April 2025.

III. AIR QUALITY Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Conflict with or obstruct implementation of the applicable air quality plan?				X
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			X	
c) Expose sensitive receptors to substantial pollutant concentrations?			X	
d) Result in other emissions (such as those leading to odors adversely affecting a substantial number of people?			X	

Setting

The Coachella Valley is in the Salton Sea Air Basin (SSAB), which includes part of Riverside County and all Imperial County. The SSAB is under the jurisdiction of the South Coast Air Quality Management District (SCAQMD). The SCAQMD is an air quality regulatory agency created to enforce the federal Clean Air Act and State's air quality program. In doing so, SCAQMD conducts inspections to evaluate and determine the basins compliance to air quality regulations.

The SCAQMD is required by Federal regulation to monitor and report the presence of criteria pollutants, identified by the Clean Air Act as: ozone (O3), particulate matter (PM10 and PM2.5), carbon monoxide (CO), lead (Pb), nitrogen dioxide (NO2), and sulfur dioxide (SO2). The SCAQMD maintains 35 permanent air quality monitoring stations throughout the South Coast Air Basin including Los Angeles, Orange County, and San Bernardino counties, and the Salton Sea Basin including Riverside County. The Project site is located within Source Receptor Area (SRA) 30, which includes monitoring stations in Palm Springs, Indio, and Mecca (Saul Martinez). Under SCAQMD, the Project is subject to the 2003 PM10 Coachella Valley Implementation Plan (SIP), 2008 Coachella Valley 8-

Hour Ozone SIP, and the 2022 SCAQMD Air Quality Management Plan (2022 AQMP). These regulatory plans aim to reduce air pollution in Palm Springs and neighboring cities since currently the Valley exceeds the federal and state standards for ozone and PM10.

The U.S. Environmental Protection Agency (U.S. EPA) designates areas according to whether it meets or does not meet the national primary or secondary ambient air quality standard for the National Ambient Air Quality Standard. In terms of ozone, the Coachella Valley is classified as an "Extreme" nonattainment region for the 2008 and "Severe-15" nonattainment for the 2015. The classifications mandate the Valley to meet the 2008 8-hour ozone 75-part per billion (ppb) standard by July 2032 and the 2015 8-hour ozone 70 ppb standard by August 2033. Regarding PM 10, the Coachella Valley is classified as "Serious". The 2003 PM 10 Coachella Valley SIP, 2008 Coachella Valley 8-Hour Ozone SIP, and 2022 AQMP comply with the EPA's mandate by outlining methods to reduce NOx, key component in ozone, and PM10.

The Project will emit criteria air pollutants during both the construction and the operational phases. Construction and operational emissions were projected using California Emissions Estimator Model (CalEEMod) Version 2022.1. CalEEMod is a Statewide land use emission computer model developed for the California Air Pollution Officers Association (CAPCOA) in collaboration with the California Air Districts, including the SCAQMD, that provides a uniform platform to quantify potential criteria pollutant and greenhouse emissions associated with construction and operation of land development projects. CalEEMod utilizes widely accepted methodologies for estimating emissions from several sources, including studies commissioned by the California Energy Commission (CEC). CalEEMod Version 2022.1 analyzes operational emissions from natural gas and electricity usage for residential and non-residential uses, and models Title 24 energy conservation standards applicable to all residential and non-residential buildings throughout California. For electricity, Title 24 uses include the major building envelope systems covered by Part 6 (California Energy Code) of Title 24 such as space heating, space cooling, water heating, and ventilation. For natural gas, Title 24 uses include building heating and hot water end uses. CalEEMod calculates criteria air pollutants, including CO, PM₁₀, PM_{2.5}, and the ozone precursors ROG and NO_x. CalEEMod output tables are provided in Appendix B.

Discussion of Impacts

- a) No Impact.** According to CEQA, a significant air quality impact could occur if the proposed project is not consistent with the applicable Air Quality Management Plan (AQMP) or would obstruct the implementation of the policies or hinder reaching the goals of that plan. The Project site is within the Coachella Valley region of the Salton Sea Air Basin (SSAB) and will be subject to SCAQMD's 2022 AQMP, the 2003 Coachella Valley PM₁₀ SIP, and the 2008 Coachella Valley 8-hour Ozone SIP. The AQMP is a comprehensive plan that establishes control strategies and guidance on regional emission reductions for air pollutants. The AQMP is based, in part, on the land use plans of jurisdictions in the region.

The Southern California Association of Governments (SCAG) adopted the 2024-2050 Regional Transportation Plan/Sustainable Communities Strategy (2024 RTP/SCS) to comply with metropolitan planning organization (MPO) requirements under the Sustainable Communities and Climate Protection Act. The RTP/SCS Growth Management chapter forms the basis of land use and transportation controls of the AQMP. Projects that are consistent with the growth forecasts are considered consistent with the AQMP.

A project is considered to be in conformity with adopted air quality plans if it adheres to the requirements of the SCAQMD Rule Book, AQMP, and adopted and forthcoming control measures, and is consistent with growth forecasts in the applicable plan(s) (or is directly included in the applicable plan). Conformity with growth forecasts can be established by demonstrating that a project is consistent with the land use plan that was used to generate the growth forecast. A non-conforming project would be one that increases the gross number of dwelling units, increases the number of vehicle trips, and/or increases the overall vehicle miles traveled in an affected area relative to the applicable land use plan.

The Project proposes the expansion of the existing Armtec facility on lands designated for industrial and urban employment uses in the General Plan. The Project would be developed in accordance with all applicable rules and regulations contained in the General Plan and 2022 AQMP to meet the applicable air quality standards, because the existing industrial use and its associated job creation potential were included in the SCAG analysis. Also, as shown in Table 1, below, Project emissions would not exceed SCAQMD thresholds for construction or operation and will not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment.

In conclusion, although the proposed Project would contribute to impacts to air quality, as discussed below, it would not conflict with or obstruct the implementation of an applicable air quality plan because its industrial characteristics were included in the development of regional plans. No impact is anticipated.

- b) Less Than Significant Impact.** A project is considered to have significant impacts if there is a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or state ambient air quality standard. As previously stated, the SSAB is currently a non-attainment area for PM₁₀ and ozone. Therefore, if the project's construction and/or operational emissions exceed SCAQMD thresholds for PM₁₀ and ozone precursors, which include carbon monoxide (CO), nitrous oxides (NO_x), and volatile/reactive organic compounds (VOC or ROG), then impacts would be cumulatively considerable and significant.

The California Emissions Estimator Model (CalEEMod) Version 2022.1 was used to project air quality emissions that will be generated by Phase 2 and Phase 3 development (Appendix B). Criteria air pollutants will be released during both the construction and operation phases of the proposed Project, as shown in Tables 1 and 2. Table 1 summarizes short-term construction-related emissions, and Table 2 summarizes ongoing emissions generated during operation.

The following Project details were used for CalEEMod modeling:

- Total disturbed acres: 6.91 acres, including on- and off-site improvements
- 15,000 SF “Manufacturing” representing the production facilities
- 37,800 SF “Unrefrigerated Warehouse- No Rail” representing the storage warehouses
- 3,000 SF “Industrial Park” representing the R&D/small production facilities
- 100,000 SF “Parking Lot” representing the truck staging area and on-site fire access roads
- 0.4 miles of road widening representing the widening of Tyler Street from the Avenue 53 to the southern property line, and various roadway improvements including sidewalk improvements adjacent to the soccer fields west of the Project site.
- 97,000 SF of landscaping, on- and off-site (preliminary estimates)
- Project total daily vehicle trips = 169
- Construction schedule: June 2025 through December 2026, 18-months
- Grading, net balance of materials on-site

Construction Emissions:

For purposes of analysis, it is assumed that construction will occur over an 18-month period. The construction period includes all aspects of project development, including site preparation, grading, paving, building construction, and application of architectural coatings.

As shown in Table 1, emissions generated by construction activities will not exceed SCAQMD thresholds for any criteria pollutant during construction. The data reflect maximum daily emissions over the 18-month construction period, including summer and winter weather conditions. The analysis assumes a net balance of materials onsite per preliminary grading plans. Applicable standard requirements and best management practices include, but are not limited to, the implementation of a dust control and management plan in conformance with SCQAMD Rule 403, proper maintenance and limited idling of heavy equipment, phased application of architectural coatings and the use of low-polluting architectural paint and coatings per SCAQMD Rule 1113.

Given that criteria pollutant thresholds will not be exceeded, and standard best management practices will be applied during construction, impacts will be less than significant.

Table 1 Maximum Daily Construction-Related Emissions Summary (pounds per day)						
Construction Emissions¹	CO	NO_x	ROG	SO₂	PM₁₀	PM_{2.5}
Daily Maximum	53.4	43.7	14	0.10	9.26	5.25
SCAQMD Thresholds	550	100	75	150	150	55
Exceeds?	No	No	No	No	No	No
Emission Source: CalEEMod model, version 2022.1						

Operational Emissions:

Operational emissions are ongoing emissions that will occur over the life of the project. They include area source emissions, emissions from energy demand (electricity), and mobile source (vehicle) emissions.

According to the Traffic Report prepared for the proposed Project (Appendix H), the proposed Project will generate approximately 169 daily trips. Table 2 provides a summary of projected emissions during operation of the proposed Project at build out. As shown below, operational emissions will not exceed SCAQMD thresholds of significance for any criteria pollutants for operations. Impacts related to operational emissions will be less than significant.

Table 2 Maximum Daily Operational-Related Emissions Summary (pounds per day)						
Operational Emissions¹	CO	NO_x	ROG	SO₂	PM₁₀	PM_{2.5}
Daily Maximum	10.1	1.12	2.45	0.02	1.52	0.41
SCAQMD Thresholds	550	55	55	150	150	55
Exceeds?	No	No	No	No	No	No
Emission Source: CalEEMod model, version 2022.1						

Cumulative Contribution: Non-Attainment Criteria Pollutants

A significant impact could occur if the Project would make a considerable cumulative contribution to federal or State non-attainment pollutants. The Coachella Valley portion of the SSAB is classified as a “non-attainment” area for PM₁₀ and ozone. Cumulative air quality analysis is evaluated on a regional scale (rather than a neighborhood scale or city scale, for example) given the dispersing nature of pollutant emissions and aggregate impacts from surrounding jurisdictions and air management districts. Any development project or activity resulting in emissions of PM₁₀, ozone, or ozone precursors will contribute, to some degree, to regional non-attainment designations of ozone and PM₁₀.

The SCAQMD does not currently recommend quantified analyses of construction and/or operational emissions from multiple development projects, nor does it provide methodologies or thresholds of significance to be used to assess the significance of cumulative emissions generated by multiple cumulative projects. However, it is recommended that a project's potential contribution to cumulative impacts should be assessed utilizing the same significance criteria as those for project-specific impacts. Furthermore, SCAQMD states that if an individual development project generates less than significant construction or operational emissions, then the development project would not generate a cumulatively considerable increase in emissions for those pollutants for which the Basin is in nonattainment.²

As shown in the tables above, Project-related PM₁₀, CO, NO_x, and ROG emissions are projected to be below established SCAQMD thresholds. Emissions will be further reduced through required best management practices, which require implementation of a Dust Control Plan in accordance with SCAQMD Rule 403.1. Therefore, the proposed Project will result in incremental, but not cumulatively considerable impacts on regional PM₁₀ or ozone levels.

Summary

As shown above, both construction and operation of the proposed Project will result in criteria emissions that are below the SCAQMD significance thresholds, and neither would violate any air quality standard or contribute substantially to an existing or projected air quality violation. Overall, impacts related to construction and operation will be less than significant and are not cumulatively considerable from a non-attainment standpoint.

- c) Less Than Significant Impact.** Sensitive receptors are individuals within the community more susceptible to health issues related to poor air quality that typically include children, the elderly, and those with preexisting health problems. The nearest sensitive receptors to the Project site are residents located east of Tyler Street and north of Avenue 53. From sensitive receptors, on-site improvements would occur at a minimum distance of 30-75 meters (100 – 250 feet), and off-site improvements would occur at a minimum distance of 5-10 meters (Tyler Street curb, gutter, roadway improvements).

Analysis of Localized Significance Thresholds (LSTs) by a local government is voluntary and is designed for projects that are less than or equal to five acres. The maximum area of disturbance associated with buildout of the proposed Project is approximately 6.91 acres, and it is assumed that buildout would occur over the

² Kroeger, A.; Goss, T. (2003). *White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution*. <http://www.aqmd.gov/docs/default-source/Agendas/Environmental-Justice/cumulative-impacts-working-group/cumulative-impacts-white-paper.pdf> (pg 7).

course of 18 months. Although the total Project area is greater than five acres, the area of daily disturbance (for purposes of LST analysis only) is limited to five acres or less per day at any given location. As such, the five-acre look up table is appropriate under the SCAQMD’s methodology to screen for potential localized air quality impacts.³ Based on the Project’s proximity to existing housing, the 5-acre site tables at a distance of 25 meters (nearest measurement option in LST table) were used for LST analysis.

Table 3 shows on-site emission concentrations for Project construction and operation will not exceed LST thresholds. Overall, the impacts will be less than significant.

Table 3 Localized Significance Thresholds Emissions (pounds per day)				
	CO	NOx	PM₁₀	PM_{2.5}
Construction				
Maximum Emissions	53.4	43.7	9.26	5.25
LST Threshold	2,292	304	14	8
Exceed?	No	No	No	No
Operation				
Maximum Emissions	10.1	1.12	1.52	0.41
SCAQMD Thresholds	2,292	304	4	2
Exceed?	No	No	No	No
Emission Source: CalEEMod model, version 2022.1 LST Threshold Source: LST Mass Rate Look-up Table, SCAQMD.				

Health Impacts

The SCAQMD is the local implementing and enforcing agency for the Air Toxics "Hot Spots" Information and Assessment Act of 1987 (commonly known as AB 2588), which established a statewide program for the inventory of air toxics emissions from specifically identified individual facilities as well as requirements for risk assessment and public notification of potential health risks. The SCAQMD requires the preparation of an operational HRA for "facilities" associated with high levels of toxic air contaminants. The eight categories of identified sources of TACs include high-traffic freeways and roads, distribution centers, rail yards, ports, refineries, chrome plating facilities, perchloroethylene dry cleaners, and large gas stations. The Project neither proposes the development of any such facilities, nor is it situated in proximity to any such facility.

³ South Coast AQMD, "Fact Sheet for Applying CalEEMod to Localized Significance Thresholds." Weblink Accessed February 2025. <https://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/cal-eemod-guidance.pdf>

As shown in Tables 1 and 2, construction and operation of the proposed Project will result in criteria emissions that are below the SCAQMD significance thresholds, and neither would violate any air quality standard or contribute substantially to an existing or projected air quality violation.

With today's technology, it is not scientifically possible to calculate the degree to which exposure to various levels of criteria pollutant emissions will impact an individual's health. There are several factors that make predicting a Project-specific numerical impact difficult:

- Not all individuals will be affected equally due to medical history. Some may have medical pre-dispositions and diet and exercise levels tend to vary across a population.
- Due to the dispersing nature of pollutants it is difficult to locate and identify which group of individuals will be impacted, either directly or indirectly.
- There are currently no approved methodologies or studies to base assumptions on, such as baseline health levels or emission level-to-health risk ratios.

Due to the limitations described above, the extent to which the Project poses a health risk is uncertain but unavoidable. It is anticipated that impacts associated with all criteria pollutants will be less than significant overall, and that health effects will also be less than significant.

d) Less than Significant Impact. The occurrence and severity of odor impacts depend on numerous factors, including the nature, frequency, and intensity of the source; wind speed and direction; and the sensitivity of the receptors. While offensive odors rarely cause any physical harm, they still can be very unpleasant, leading to distress among the public and often generating citizen complaints to local governments and regulatory agencies.

The SCAQMD identifies certain land uses as sources of odors. These land uses include agriculture (farming and livestock), wastewater treatment plants, food processing plants, chemical plants, composting facilities, refineries, landfills, transfer stations, and fiberglass molding. The proposed Project will be developed with a mix of warehouse storage space and industrial production of small quantities of combustible materials in various configurations. The type of production proposed, and that currently exists onsite, occurs indoors and does not generate objectionable odors.

Short term odors associated with paving and construction activities could be generated; however, any such odors would be quickly dispersed below detectable levels as distance from the construction site increases and would occur for short time periods during construction only.

Overall, impacts from objectionable odors are expected to be less than significant.

Mitigation Measures: None

Monitoring: None

Source: SCAQMD CEQA Air Quality Handbook (1993); SCAQMD Rule 402; 2022 Air Quality Management Plan, SCAQMD; Coachella Valley PM10 State Implementation Plan (2003 CV PM10 SIP); Coachella Valley 2008 8-hour Ozone SIP; SCAQMD Localized Significance Thresholds Appendix C – Mass Rate LST Look-up Table; CalEEMod Version 2022.1.

IV. BIOLOGICAL RESOURCES Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?		X		
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?				X
c) Have a substantial adverse effect on federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?				X
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?				X
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?				X
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?				X

Setting

The City of Coachella is in the eastern Coachella Valley in the Sonoran Desert subunit of the Colorado Desert. The valley floor experiences extreme heat and aridity, and hosts limited vegetation communities compared to the higher plant diversity and density in hillsides, alluvial fans, and mountainous areas. The City is bisected by the Whitewater River/Coachella Valley Stormwater Channel and Coachella Canal, both of which traverse generally northwest to southeast.

Common vegetation communities and habitat types identified within the City's General Plan planning area include Sonoran Creosote Bush Scrub, Colorado Saltbrush Scrub, and Desert Sand Fields. Common wildlife species include reptiles (side-blotched lizard, western whiptail, coachwhip), birds (mourning dove, house finch, California horned lark, common raven, Gambel's quail, black-tailed gnatcatcher, greater roadrunner, prairie falcon, red-tailed hawk), and mammals (desert cottontail, coyote). Ten special status plants and 31 special status wildlife species were identified in the General Plan as having a potential to occur in the regional vicinity of the General Plan planning area; however, only two listed species and 18 otherwise special status plant and wildlife species were identified with some chance of occurring within the planning area.

The City is within the boundaries of the Coachella Valley Multiple Species Habitat Conservation Plan/Natural Community Conservation Plan (CVMSHCP/NCCP), a comprehensive conservation plan encompassing approximately 1,136,400 acres in the Coachella valley. The City of Coachella is a Permittee to the CVMSHCP/NCCP and, as such, is subject to its provisions. According to the General Plan Draft Environmental Report (DEIR, 2014), the CVMSHCP identified the following endangered species existing within the General Plan planning area:

- Round-tailed Ground Squirrel located in the Mecca Hills, and along SR 86.
- Crissal Thrasher located along SR 86 and southern portion of SR 11, and the Southwestern border of the City.
- Desert Tortoise: Habitat is located in the Mecca Hills
- Flat-Tailed Horned Lizard: Located east of the Coachella Canal
- Le Conte's Thrasher: Located east of the Coachella Canal

The subject property is in an area characterized by industrial, residential, commercial, and vacant lands. Historically the subject property was in agricultural production from at least 1949 to the late 1960s. By 1972, the property had been partially developed with the current Armtec facility, with facility expansions occurring in 1984, 1996, 2002, and 2006. Currently the northern parcel is largely undeveloped with the exception of the Phase 1 solar array located on the eastern half of the parcel. Flora and fauna observed during the site survey as part of the Archeo/Paleo study (Appendix D) included but was not limited to desert grasses, shrubs, succulents, invasive mustards, lizards, coyote scat, grasshoppers, butterflies, and ravens. No natural water sources are present on the property.

Discussion of Impacts

- a) **Less than Significant with Mitigation.** The southern portion of the Project site is currently developed with the existing Armtec facility, and the northern portion is partially developed with a solar array. The entire site has been heavily disturbed by previous grading activities and operation of the existing Armtec facility. Vegetation coverage is generally sparse with regrowth of shrubs and desert grasses, primarily on the northern portion of the site. The surface soils are composed mainly of soft fine silty-sands, hard-pan clay, and loose sands with brittle calcium carbonate and salt deposits (Archeo/Paleo Study, Appendix D).

According to the U.S. Department of Fish and Wildlife Service (USFW) IPaC list (Appendix C), no federally listed threatened, endangered, proposed and candidate species, or proposed and final designated critical habitat, occur within the Project boundaries. According to the General Plan Draft Environmental Report (DEIR, 2014), the Project site does not occur within any active or proposed CVMSHCP conservation areas or other biological resource area.

Due to the disturbed nature of vegetation and soils, the Project site has a very low to low potential to harbor sensitive wildlife species. The existing vegetation on and adjacent to the property has a low potential to provide nesting opportunities for birds covered under the Migratory Bird Treaty Act (MBTA), and potential impacts to migratory bird species are considered negligible.

Burrowing owl is a state species of special concern that resides in open dry grasslands and desert areas. The burrowing owl has recently been proposed for listing by the California Department of Fish and Wildlife (CDFW). The southern portion of the site is currently developed with existing Armtec facilities or disturbed by daily operations, with no potential for burrowing owl to be present. Since the northern portion of the site is predominantly vacant and covered sparsely with vegetation, there is potential of burrowing owl to be present. The CVMSHCP and State law prohibit the take of burrowing owl. Should burrowing owl be found on the northern portion of the property prior to construction of Phase 2, a significant impact would occur. To assure that potential impacts are avoided, Mitigation Measure BIO.1 is provided below, which requires pre-construction surveys of the northern parcel to assure that the species is not present, and/or to protect the species should it be identified on-site. With implementation of this mitigation measure, impacts to burrowing owls will be less than significant.

Implementation of Mitigation Measures BIO.1 and adherence to existing federal, state, and City regulations will ensure potential impacts are reduced to less than significant levels.

- b) **No Impact.** The Project site does not contain any riparian habitat or sensitive natural communities protected by local plans, the California Department of Fish and Wildlife, or U.S. Fish and Wildlife Service. The site is surrounded by urban development. Onsite soils have been disturbed by previous grading activity, and onsite vegetation is limited to only sparse annual regrowth. No Project-related impacts would occur, and no mitigation measures would be required.
- c) **No Impact.** The Project site is located approximately one mile southwest of the Coachella Valley Stormwater Channel (CVSC) and does not contain any streams, marshes, protected wetlands, or vernal pools protected by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service. No Project-related impacts would occur, and no mitigation measures would be required.
- d) **No Impact.** Surrounding lands include residential, agricultural, some commercial, vacant lands and roadways. The site lacks connections to other native habitats. No wildlife corridors or biological linkages are mapped, known, or expected on the Project site. Although the site's northern parcel may provide marginal habitat for burrowing owls, the Project site is not identified as a nursery site. Therefore, the site does not experience the migration of native wildlife and does not substantially interfere with the movement of any species, nor does it limit the use of native wildlife nursery sites.
- e) **No Impact.** The proposed Project will not conflict with any local ordinances protecting biological species and will be required to comply with the landscaping and other applicable requirements of the Municipal Code. No impact will occur.
- f) **No Impact.** The subject property is within the boundaries of the CVMSHCP, and the City of Coachella is a Permittee to the CVMSHCP. The Project does not propose a land use designation change that would convert protected or open space lands to urban uses. The Project proponent will be required to pay the local development mitigation fee to mitigate impacts to covered species. Payment of the fee is a standard requirement of projects in the CVMSHCP coverage area. The Project will not conflict with this or any other habitat conservation plan or natural community conservation plan. No impact will occur.

Mitigation Measures:

- BIO-1** A qualified biologist shall conduct two (2) take avoidance pre-construction burrowing owl surveys on the northern parcel of the Project site during Phase 2. The first shall occur between 14 and 30 days prior to ground disturbance, and the second shall occur within 24 hours of ground disturbance. If burrowing owls are detected, the project proponent shall consult with CDFW to determine what course of action is needed, such as the use of exclusion devices (if applicable) to discourage owls from using burrows that are believed to be in jeopardy of being impacted by implementation of the project.

Mitigation Monitoring:

BIO-A Prior to the issuance of any permit to allow ground disturbance on the northern parcel of the site, the Project Proponent shall submit the pre-construction surveys for burrowing owl to the City.

Responsible Parties: Project applicant, project biologist, Planning Division.

Source: Coachella General Plan Draft Environmental Impact Report, 2014; Coachella General Plan; City of Coachella General Plan; CVMSHCP; Phase 1 Archaeological and Paleontological Resources Assessment for the Armtec Defense Products Co. Master Plan Project, prepared by ArchaeoPaleo Resource Management, Inc. August 2024; Project materials.

V. CULTURAL RESOURCES Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Cause a substantial adverse change in the significance of a historical resource pursuant to in § 15064.5?				X
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?		X		
c) Disturb any human remains, including those interred outside of formal cemeteries?				X

Setting

In the City of Coachella, the only registered historical resource is the Coachella Valley Water District Building along Highway 111 and Grapefruit Boulevard, which is designated as a California Point of Historical Interest and a Riverside County Historical Landmark (General Plan EIR). Many other sites are considered eligible for formal designation. The City's historic core is considered highly sensitive for historic resources, generally between Harrison Street and State Route 111 (EIR Figure 4.4-2).

Given the long history of Coachella as Native American land, the City contains significant archaeological resources, none of which are designated by any state or national register but may be considered eligible.

The Mecca Hills, Thermal Canyon, and washes north of Thermal Canyon host archaeologically significant trails, mining sites, and other artifacts from previous settlements. There are also possible sites along the west side of the Whitewater River, and in the downtown area.

Historically, the subject property was in agricultural production from at least 1949 to the late 1960s. By 1972, the property been partially developed with the current Armtec facility, with facility expansions occurring in 1984, 1996, 2002, and 2006. Currently the northern parcel is largely undeveloped with the exception of the Phase 1 solar array located on the eastern half of the parcel.

In 2024, ArchaeoPaleo Resource Management, Inc. (APRMI) conducted a Phase I Archaeological and Paleontological Resources Assessment (Archeo/Paleo Assessment) for the Project site, which included a historical background and records search, a Sacred Lands Files search at the State of California Native American Heritage Commission (NAHC) and field inspection of the Project site.

Historical and Archaeological Resources

According to PRC §5020.1(j), "'historical resource' includes, but is not limited to, any object, building, site, area, place, record, or manuscript which is historically or archaeologically significant, or is significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California." More specifically, CEQA guidelines state that the term "historical resources" applies to any such resources listed in or determined to be eligible for listing in the California Register of Historical Resources, included in a local register of historical resources, or determined to be historically significant by the Lead Agency (Title 14 CCR §15064.5(a)(1)-(3)).

Regarding the proper criteria of historical significance, CEQA guidelines mandate that "a resource shall be considered by the lead agency to be 'historically significant' if the resource meets the criteria for listing on the California Register of Historical Resources" (Title 14 CCR §15064.5(a)(3)). A resource may be listed in the California Register if it meets any of the following criteria:

- (1) Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage.
- (2) Is associated with the lives of persons important in our past.
- (3) Embodies the distinctive characteristics of a type, period, region, or method construction, or represents the work of an important creative individual, or possesses high artistic values.
- (4) Has yielded, or may be likely to yield, information important in prehistory or history. (PRC §5024.1(c))

Discussion of Impacts

- a) No Impact.** Section 15064.5 of the CEQA Guidelines defines a historic resource as a resource that is: (1) listed in, or determined to be eligible for listing in the California Register of Historical Resources (California Register); (2) included in a local register of historical resources (pursuant to Section 5020.1(k) of the Public Resources Code); or (3) identified as significant in an historical resources survey (meeting the criteria in Section 5024.1(g) of the Public Resources Code). Generally, a resource shall be considered by the lead agency to be "historically significant" if the resource meets the criteria for listing on the California Register. The California Register automatically includes all properties listed in the National Register of Historic Places (National Register) and those formally determined to be eligible for listing in the National Register.

Archival Research

APRMI conducted archival research through different inventory databases and historic societies, including the libraries of the National Geographic Database, the University of Maryland and the University of California, Los Angeles. Results of the search determined that no historic buildings are present on site.

Cultural Records Search

On December 5th, 2023, APRMI requested a Cultural Resource Records Search from the Eastern Information Center (EIC) in Riverside, California to identify any cultural resources on or adjacent to the Project site.

Results of the records search indicate there is one prehistoric site within 650 feet of the Project site, and 14 historic buildings, two historic sites, and one historic district within a 1-mile radius of the site. There were also 37 previous cultural reports conducted within a 1-mile radius, with two surveys including the Project area. However, none of these resources are located on or adjacent to the Project site and will not be affected by Project-related construction activities.

Summary

No historical resources are present on site, and no historical resources would be impacted from construction of the Project. Therefore, there will be no impacts.

- b) Less than Significant with Mitigation.** Section 15064.5(a)(3)(D) of the CEQA Guidelines defines archaeological resources as any resource that “has yielded, or may be likely to yield, information important in prehistory or history.” Archaeological resources are features, such as tools, utensils, carvings, fabric, building foundations, etc., that document evidence of past human endeavors and that may be historically or culturally important to a significant earlier community.

Cultural Records Search

On December 5th, 2023, APRMI requested a Cultural Resource Records Search from the Eastern Information Center (EIC) in Riverside, California to identify any cultural resources on or near the Project site.

Results of the records search indicate there is one prehistoric site within 650 feet of the Project site, and 14 historic buildings, two historic sites, and one historic district within a 1-mile radius of the site. There were also 37 previous cultural reports conducted within a 1-mile radius, with two surveys including the Project area. However, none of these resources are located on or adjacent to the Project site and will not be affected by Project-related construction activities.

Sacred Lands File Search

In accordance with Senate Bill 18, APRMI also requested a Sacred Lands File and Native American Contact List request with Native American Heritage Commission (NAHC) in West Sacramento, California on December 5th, 2023.

On December 26th, 2023 APRMI received an email from Cultural Resources Analyst Xitlaly Madrigal of the Agua Caliente Band of Cahuilla Indians stating that the Project area lies within the Tribe’s Traditional Use Area and requested several

mitigation measures. The City has also contacted Tribal representatives as part of the AB 52 consultation process described in Section XVIII (Tribal Cultural Resources) of this Initial Study. As per the results of the APRMI Archaeo/Paleo Assessment, and AB 52 consultation between the City and ACBCI, Mitigation Measure CUL-1 through CUL-8 are provided below. No other responses have been received as of January 26th, 2024.

Field Reconnaissance

On June 6th, 2024, APRMI staff conducted a field reconnaissance of the Project area to evaluate the presence of any archaeological resources, to determine if the development of the Project would have any significant direct or indirect adverse impacts on such resources.

Objects observed on the ground surface included fragmented clay water pipes, sewer pipe fragments (potential transite), tiling, cardboard, glass bottle fragments, wood pieces, PVC, golf balls, modern gravel, oxidized metal (bolts, nails, frames), porcelain ceramic ware fragments, and plastic refuse. Objects collected during the survey included a 14 cm x 3.5 cm oval-shaped volcanic stone with mica/crystalline inclusions, a brown glass bottle bottom with "Duraglas" embossed in cursive on the bottom, one piece of quartz, and three small modern snail shells. The lack of observing artifacts/fossils at the surface during this site survey, does not conclude that there will not be artifacts or fossils uncovered during construction excavation activities.

Summary of Impacts and Recommendations

APRMI determined that due to the high sensitivity of the Project area for cultural and tribal resources, and at the request of the Agua Caliente Band of Cahuilla Indians, it is recommended that both a tribal monitor and a qualified archaeologist be present on site to monitor any ground-disturbing activities, as described in Mitigation Measure CUL-1 through CUL-8. With implementation of these mitigation measures, potential impacts to archaeological resources will be reduced to less than significant levels.

- c) No Impact.** No cemeteries or human remains are known to occur onsite. It is unlikely that human remains will be uncovered during Project development. However, should human remains be uncovered, California law requires that all activity cease and the coroner be notified to determine the nature of the remains and whether Native American consultation is needed. This requirement of law assures that there will be no impact to cemeteries or human remains.

Mitigation Measures:

- CUL-1** Prior to the start of Project excavation, a qualified archaeologist shall be retained, and create a Worker's Environmental Awareness Program (WEAP) pamphlet that will be prepared by the Project Archaeologist and provided

by the Archaeologist as a training class to Project personnel, so they understand the regulatory requirements for the protection of cultural resources. This training class shall include examples of cultural resources to look for during project excavation and the protocols to follow if discoveries are made.

CUL-2 Archaeological resources monitoring shall be conducted by a professional archaeological resources monitor during Project related earth-disturbing activities, per OHP standards, under the supervision of a qualified Project Archaeologist. Monitoring will entail visual inspection of Project related earth-disturbing activities in native soil. If the Archaeologist deems that the excavation is no longer in soil that would produce artifacts, features, or sites, the monitoring can cease.

CUL-3 As per the results of the AB 52 Government to Government Consultation, prior to the issuance of grading permits, the developer/permit applicant shall enter into an agreement with the Agua Caliente Band of Cahuilla Indians, for a Native American Monitor. The Native American Monitor(s) shall be on site during all initial ground-disturbing activities and excavation of each portion of the project site, including clearing, grubbing, tree removals, grading, and trenching. In conjunction with the Archaeological Monitors(s), the Native American Monitor(s) shall have the authority to temporarily divert, redirect, or halt the ground disturbance activities to allow identification, evaluation, and potential recovery of cultural resources. The developer/permit applicant shall submit a fully executed copy of the agreement to the City to ensure compliance with this condition of approval.

CUL-4 If an archaeological resource is encountered during excavation when the monitor(s) are not on site, all excavation shall cease within at least 50 feet of the discovery and the Principal Investigator, Lead Archaeologist and the Tribe must be notified. Work cannot resume in the direct area of the discovery until it is assessed by the Principal Investigator, and/or Lead Archaeologist, and the Tribe, and indicates that excavation can resume.

CUL-5 If an archaeological discovery cannot be preserved in situ and requires an excavation team or requires additional time to collect cultural resources, a Discovery and Treatment Plan (DTP) will be developed by the Lead Archaeologist in collaboration with the Consulting Tribe(s), and the area will be cordoned off and secured so that an archaeological resources excavation team, led by the Principal Investigator and Lead Archaeologist, may recover the cultural resources out of that location. Once the Principal Investigator has determined that the collection process is complete for a given area or locality, construction activity can resume in that localized area.

CUL-6 If human remains are encountered, all work on the project will be suspended and the City of Coachella will be contacted immediately. The City of Coachella will contact the Riverside County coroner. If the remains are deemed Native American in origin, the coroner will contact the NAHC if a Native American monitor has not been assigned to the Project, in which the NAHC will identify a most likely descendant in compliance with Public Resources Code Section 5097.98 and California Code of Regulations Section 15064.5. After their notification by the Native American Heritage Commission, the Most Likely Descendant will have 48 hours to visit the site and make recommendations as to the treatment and final deposition of the remains. Work may be resumed at the landowner's discretion but will only commence after consultation and treatment have been concluded to the satisfaction of the lead agency and the Native American tribe.

CUL-7 All non-Native American related cultural resources collected by the archaeologist, such as early settler historic items or sites, will be prepared in a properly equipped laboratory to a point ready for curation. Artifacts will be identified, photographed, analyzed, catalogued, and delivered to an accredited museum repository for permanent curation and storage or to the appropriate Accompanying notes, maps, and photographs shall also be filed at the final repository. The cost of curation is assessed by the repository and is the responsibility of the Project proponent.

If Tribal Resources are found, treatment will be as follows: Reburial of the resources on the Project property in a location agreed upon by the Developer and Consulting Tribe(s). The measures for reburial shall include, at least the following: Measures to protect the reburial area from any future impacts. Reburial shall not occur until all required cataloging, analysis and studies have been completed on the cultural resources, with the exception of sacred items, burial goods, and Native American human remains. Any reburial processes shall be culturally appropriate.

CUL-8 At the conclusion of laboratory work but prior to museum curation of non-Native American artifacts, a final (negative or positive) findings report will be prepared describing the results of the cultural mitigation monitoring efforts associated with the Project. The report will include a summary of the field and laboratory methods, an overview of the cultural background within the project vicinity, a list of cultural resources recovered (if any), an analysis of cultural resources recovered (if any) and their scientific significance, and recommendations. A copy of the report will be prepared for the City of Coachella, the EIC, and be submitted to the designated museum repository (if applicable).

Monitoring:

CUL-A Within 30 days of the completion of ground disturbing activities on the Project site, a report of findings shall be filed with the City and with the Agua Caliente Band of Cahuilla Indians. The report will summarize the methods and results of the evaluation, including an itemized inventory and a detailed analysis of recovered artifacts, upon completion of the field and laboratory work. The report should include an interpretation of the cultural activities represented by the artifacts and a discussion of the significance of all archaeological finds.

Responsible parties: Project applicant, Project archaeologist, Tribal monitor, Planning Division, Engineering Department.

Source: Coachella General Plan; City of Coachella General Plan Update Final Environmental Impact Report (CGPU EIR, SCH No. 2009021007), October 2014; Phase 1 Archaeological and Paleontological Resources Assessment for the Armtec Defense Products Co. Master Plan Project, prepared by ArchaeoPaleo Resource Management, Inc. August 2024.

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

Setting

Primary energy sources include fossil fuels (e.g. oil, coal, and natural gas), nuclear energy, and renewable sources (e.g. wind, solar, geothermal and hydropower). The Project's energy supply will be serviced by Imperial Irrigation District (IID) for electricity and the Southern California Gas Company (SoCalGas) for natural gas.

SoCalGas serves central and southern California, encompassing approximately 24,000 square miles and 21.1 million consumers. Existing natural gas supply comes from regional natural gas lines that traverse the city, including two 30-inch lines and a 36-inch line located along the powerline corridor within the Mecca Hills. The distribution network in the city connects to these regional lines through an 8-inch, 6-inch, and 4-inch high-pressure lines. According to the General Plan, natural gas usage for 2010 for commercial, public and residential was 3,823,723 therms, and is expected to increase to 17,009,166 therms by 2035.

Imperial Irrigation District (IID) is the City's sole electricity provider and serves over 145,000 customers. The IID's operating headquarters is located in Imperial, California. The IID has a distribution system that contains 112 substations, 3,402 miles of overhead distribution lines, 675 miles of underground distribution lines, and 125,616 active meters. Electricity is delivered to the City of Coachella via a 230-kilovolt (KV) transmission line located in Indio Hills, which is north of the City of Coachella. Electricity is transferred from this transmission line to one of the four substations in the city maintained by IID, which include the Coachella Valley Substation, Coachella City Substation, 52nd Avenue Substation, and Thermal Substation. According to the General Plan, IID electricity demand for 2010 for commercial, public and residential was 220,782,340 kWh, and is expected to increase to 1,099,608,548 kWh by 2035.

Both SoCalGas and IID offer programs and incentives to reduce energy consumption. The City adopted its Climate Action Plan in April 2015, which provides additional measures on energy efficiency and conservation.

According to the CARB EMFAC2021 Model, the total annual VMT for Riverside County in 2024 was 58,964,176 miles for all vehicle classes. For analysis purposes, assuming the same average fuel economy of 24.4 mpg would result in a county total annual fuel consumption of 2,416,565 gallons in 2024.

Discussion of Impacts

- a) **Less than Significant Impact.** The proposed Project will consume energy during both construction and long-term operation.

Construction Energy Demand

Energy will be consumed during construction for activities associated with parking lot demolition, site preparation, grading, building construction, paving, and architectural coating. The primary energy source during construction would be petroleum fuels (i.e. gasoline and diesel), which would be used for the operation of heavy equipment, manufacturing and transport of materials, and transport of construction workers. Electricity would be used to a lesser extent, in order to power electric equipment, worksite lighting, and temporary worksite offices.

Table 4 provides construction equipment fuel estimates based on the construction activity timeline, construction equipment schedules, equipment power ratings, and load factors programmed in CalEEMod. The aggregate fuel consumption rate for all equipment is estimated at 18.5 horsepower hour per gallon (hp-hr-gal.), per the California Air Resource Board's (CARB's) Carl Moyer Program Guidelines (2018), Table D-21 Fuel Consumption Rate Factors.⁴ For analysis purposes, CalEEMod assumes all construction equipment is diesel powered. As shown in the table below, Project construction activities would consume an estimated 49,130 gallons of diesel fuel.

⁴ The Carl Moyer Program Guidelines Volume I: Program Overview, Program Administration and Project Criteria, approved by the California Environmental Protection Agency Air Resource Board on April 27, 2017.

Table 4 Construction Equipment Fuel Consumption Estimates								
Phase	Duration (Days)	Equipment	HP Rating	Qty	Usage Hours	Load Factor	HP-hrs/day	Fuel Consumption
Site Preparation	22	Rubber Tired Dozers	367	3	8	0.4	3,523	4,190
		Tractors/Loaders/Backhoes	84	4	8	0.37	995	1,183
Grading	45	Graders	148	1	8	0.41	485	1,181
		Excavators	36	2	8	0.38	219	532
		Tractors/Loaders/Backhoes	84	2	8	0.37	497	1,210
		Rubber Tired Dozers	367	1	8	0.4	1,174	2,857
Building Construction	335	Cranes	367	1	7	0.29	745	13,491
		Forklifts	82	3	8	0.2	394	7,127
		Generator Sets	14	1	8	0.74	83	1,501
		Welders	46	1	8	0.45	166	2,999
		Tractors/Loaders/Backhoes	84	2	8	0.37	435	7,879
Paving	20	Pavers	81	2	8	0.42	544	588
		Paving Equipment	89	2	8	0.36	513	555
		Rollers	36	2	8	0.38	219	237
Arch Coating	43	Air Compressors	37	1	6	0.48	107	248
Linear Grading	8	Excavators	36	3	8	0.38	328	142
		Crawling Tractors	87	1	8	0.43	299	129
		Graders	148	2	8	0.41	971	420
		Rollers	36	2	8	0.38	219	95
		Tractors/Loaders/Backhoes	84	4	8	0.37	995	430
		Rubber Tired Dozers	150	1	8	0.36	432	187
		Scrapers	423	2	8	0.48	3,249	1,405
Linear Paving	5	Rollers	36	2	8	0.38	219	59
		Paving Equipment	89	1	8	0.36	513	139
		Pavers	81	1	8	0.42	544	147
		Tractors/Loaders/Backhoes	84	3	8	0.37	746	202
Total								49,130
Fuel consumption = $\frac{[(\text{Usage Hours} \times \text{Qty.}) \times \text{Load Factor}] \times \text{HP Rating}}{18.5} \times \text{Number of Days}$								

Table 5 shows the estimated annual fuel consumption resulting from Project construction worker trips. The construction phase duration, trip type, daily worker trips, and trip lengths were derived from the Project's CalEEMod detailed report. The average vehicle fuel economy estimates were derived from the U.S. Department of Energy Alternative Fuels Data Center.⁵ For purposes of this analysis, it is assumed that the majority of worker trips are by cars (24.4 miles per gallon (mpg), gasoline), and vendor trips are by delivery trucks (7.7 mpg, diesel). As shown in the table below, it is assumed that 11,492 gallons of fuel will be consumed related to construction work vehicle trips.

⁵ Average Fuel Economy by Major Vehicle Category, last updated January 2024. U.S. Department of Energy. Accessed September 2024. <https://afdc.energy.gov/data/10310>

Phase	Duration (Days)	Trip Type	Worker Trips/Day	Trip Length (Miles)	VMT	Avg. Fuel Economy (mpg)	Fuel Consumption (gallons)
Site Preparation	22	Worker	17.5	18.5	7,122.5	24.4	292
Grading	45	Worker	15	18.5	12,487.5	24.4	512
Building Construction	335	Worker	23.4	18.5	145,021.5	24.4	5,944
	335	Vendor	9.15	10.2	31,265.6	7.7	4,060
Paving	20	Worker	15	18.5	5,550.0	24.4	227
Architectural Coating	43	Worker	4.69	18.5	3,730.9	24.4	153
Linear Grading	8	Worker	37.5	18.5	5,550.0	24.4	227
		Vendor	1	10.2	81.6	7.7	11
Linear Paving	5	Worker	17.5	18.5	1,618.8	24.4	66
Construction Worker Vehicle Fuel Demand (Gallons of Fuel)							11,492

In summary, the total fuel consumption related to Project construction would be 60,622 gallons. It should be noted that the use of construction equipment and construction worker trips would represent a “single-event” fuel demand and would not require an on-going demand for fuel resources. In addition, the equipment used for Project construction would conform to CARB regulations and California emissions standards intended to clean up construction equipment fleets by retiring older models for newer, cleaner models. 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, gasoline and diesel fuels consumed for transportation during construction of the Project would be temporary and would not be wasteful or inefficient. Therefore, impacts would be less than significant.

Operational Energy Demand

The Project's air quality and greenhouse gas emissions were projected using the California Emissions Estimator Model (CalEEMod) Version 2022.1. The results of this modeling included the Project's estimated annual energy consumption during operations. According to CalEEMod, the Project is projected to use 1,081,218 kWh of electricity per year and 1,240,880 kBtu (12,412 therms) of natural gas per year. The Project is within the service area for Southern California Gas (SoCalGas) and Imperial Irrigation District (IID).

Long-term operational energy demand will be generated by Project lighting, production activities and operation of machinery, and heating/ventilation/air conditioning (HVAC) systems. Energy would be consumed during the operation of the facilities, the transport and conveyance of water, and solid waste hauling and disposal. However, the Project will result in the expansion of existing industrial

and storage uses typical of industrial uses on site and throughout the City and region. Buildings will be constructed in accordance with the state Building Code, ATF 27 CFR § 555.203 and 27 CFR § 555.210, Green Building Code, and Energy Code in effect at the time that development occurs, to ensure the most efficient building technologies are used, which will benefit overall building operations, ensure energy efficiency, and reduce wasteful and unnecessary consumption of energy resources. Furthermore, the Renewable Portfolio Standard, as updated by Senate Bill 100, requires energy providers to derive 60 percent of their electricity from renewable energy sources by 2030 and 100 percent by 2045. As a result, electricity needs not met by the required on-site renewable energy generation and provided by IID will increasingly be come from renewable sources.

Overall, both the proposed development and the electricity provider will be required to comply with state regulations, ensuring that the Project does not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. Compliance with state regulations will ensure that the proposed development will not be wasteful, inefficient, or unnecessary if its energy consumption, and that associated impacts will be less than significant.

Transportation Energy Demand

The Project will not directly increase the population and will therefore not directly increase vehicle trips and miles traveled (VMT) and long-term fuel demand. According to the Project-specific traffic impact analysis, the Project is estimated to generate 169 additional vehicle trips per day (see Section XVII, Transportation). CalEEMod estimated that the Project would generate 760,950 VMT per year. Energy that would be consumed by Project-generated traffic is a function of total VMT and estimated vehicle fuel economies of vehicles accessing the Project site. Assuming an average fuel economy of 24.4 mpg for passenger cars and 7.7 mpg for delivery trucks⁶, and assuming 50 percent of the miles would be from passenger cars and 50 percent from long haul delivery trucks, the Project will demand 65,006 gallons of fuel annually. According to the CARB EMFAC2021 Model, the total annual VMT for Riverside County is 58,964,176 miles for all vehicle classes. For analysis purposes, assuming the same average fuel economy of 24.4 mpg would result in a county total annual fuel consumption of 2,416,565 gallons. The Project total annual consumption of 65,006 gallons represents 2.69 percent of the County's total fuel consumption in 2024.

Project annual fuel consumption estimates likely represent maximums that would occur because the average fuel economies of vehicles accessing the Project site can be expected to improve as newer, more efficient vehicle models enter the circulation system. Project trip generation and VMT are consistent with other industrial uses of similar scale and configuration, as reflected respectively in

⁶ Average Fuel Economy by Major Vehicle Category, last updated January 2024. U.S. Department of Energy. Accessed June 11, 2024. <https://afdc.energy.gov/data/10310>

CalEEMod. Therefore, Project operations would not result in excessive and wasteful vehicle trips and VMT, nor excess and wasteful vehicle energy consumption compared to other residential developments of similar size.

Conclusion

The Project energy use during construction and operation will not be wasteful, inefficient, or unnecessary because of the Project's compliance to the applicable state and local energy code. Impacts are limited to less than significant levels.

- b) No Impact.** The Clean Energy and Pollution Reduction Act (Senate Bill 350) increased California's renewable electricity goal from 33 percent by 2020 to 50 percent by 2030. The objective of the senate bill is to increase the use of renewable energy sources including solar, wind, biomass, geothermal, and others. The SB 350 targets utilities such as IID to develop and adopt the production of energy through renewable sources as to continue meeting the customer's resource needs, reduce GHG emissions, and introduce clean energy to the grid.

The Project will not conflict with the implementation or effectiveness of SB 350 or any other state or local renewable energy and/or energy efficiency plan or policy. The development will consist of the expansion of industrial facilities which will be required to adhere to the City's building code, zoning ordinance, and other standards, including the Coachella 2015 Climate Action Plan. The Project will not obstruct or limit the any state or local plan and/or policy regarding renewable energy or energy efficiency and thus, no impacts are expected.

Mitigation Measures: None.

Monitoring: None.

Source: Southern California Edison, www.calcities.org/detail-pages/partner/edison, accessed August 2024; *Integrated Resource Plan | Imperial Irrigation District*. (2024). lid.com. <https://www.iid.com/power/renewable-energy/integrated-resource-plan>; EMFAC. (2025). [Ca.gov. https://arb.ca.gov/emfac/scenario-analysis/generate-template](https://arb.ca.gov/emfac/scenario-analysis/generate-template).

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

Setting

Geology and Soils

The Project is located in the City of Coachella which is part of the Coachella Valley. The geology and seismicity of the Coachella Valley is primarily influenced by the tectonics of the San Andrea and San Jacinto fault systems. The San Andreas Fault is a continental transform fault that extends roughly 750 miles through California. It forms the tectonic boundary between the Pacific Plate and the North American Plate, and its motion is right-lateral strike-slip (horizontal). The San Jacinto Fault Zone (SJFZ) is a major strike-slip fault zone that runs through San Bernardino, Riverside, San Diego, and Imperial Counties in Southern California. The SJFZ is a component of the larger San Andreas transform system and is considered to be the most seismically active fault zone in the area.

The Coachella Valley is located in the northwestern portion of the Salton Trough which is bounded by the San Bernardino Mountains on the northwest, San Jacinto Mountains on the west, Santa Rosa Mountains on the south, and Little San Bernardino Mountains and Indio Hills on the northeast. Regional soils range from rocky outcrops within the mountains bordering the valley to coarse gravels of mountain canyons and recently laid fine- and medium-grained alluvial (stream deposited) and aeolian (wind deposited) sediments on the central valley floor. Episodic flooding of major regional drainages, including the Whitewater River, results in the deposition of sand and gravel on the valley floor. Strong sustained winds emanating from the San Gorgonio Pass cause wind erosion and transport and deposit dry, finely granulated, sandy soils on the central valley floor. Soils in the project area primarily consist of myoma fine sand and Coachella fine sands.

Paleontological Resources

Paleontological resources are the fossilized remains of prehistoric animals and plants, created more than 12,000 years ago in the Pleistocene era. A relatively thick sequence (20,000 feet) of sediment has been deposited in the Coachella Valley portion of the Salton Trough from the Miocene era to present times. These sediments are predominantly terrestrial in nature with some lacustrine (lake) and minor marine deposits. The major contributor of these sediments has been the Colorado River. The mountains surrounding the Coachella Valley are composed primarily of Precambrian metamorphic and Mesozoic "granitic" rock. The County of Riverside considers paleontological resources and states "they are valued for the information they yield about the history of the earth and its past ecological settings."

In 2024, ArchaeoPaleo Resource Management, Inc. (APRMI) conducted a Phase I Archaeological and Paleontological Resources Assessment (Archeo/Paleo Assessment) for the Project site that included a paleontological resources records check.

Discussion of Impacts

- a.i) No Impact.** Alquist-Priolo Earthquake Fault Zone is the San Andreas Fault Zone located in the northeast portion of the city, approximately 2.8 miles northeast of the Project site.⁷ No fault-related surface rupture would occur because the Project site is not located within or adjacent to an Alquist-Priolo Earthquake Fault Zone.
- a.ii) Less than Significant with Mitigation.** The Coachella Valley is a seismically active region. The most prominent active fault in the city is the San Andreas Fault, 2.8 miles northeast of the Project site, which has a probable magnitude range of 6.8-8.0 on the Richter scale. The Project would be exposed to strong ground shaking during a major quake on nearby faults, which could expose people and structures to safety risks. The impacts associated with ground shaking could be significant without mitigation.

The Project will be required to comply with the California Building Code (CBC) in effect at the time that development occurs, which includes seismic safety specifications and requirements. The Project should be constructed based on parameters for the Site Class D designation. Adherence to the CBC and recommendations from the geotechnical report required by the city prior to the issuance of grading and building permits will reduce potential impacts associated with strong seismic ground shaking to less than significant levels on the subject property (Mitigation Measure GEO-1).

- a.iii) Less than Significant with Mitigation.** Seismically induced liquefaction is the loss of soil strength caused by a sudden increase in pore water pressure shortly after an earthquake. Liquefaction can occur with a combination of the following conditions: saturated soil or soil below the groundwater table, strong ground shaking, and susceptible soil types such as loose sands and gravels. Lateral spreading is a form of liquefaction-related hazard.

According to the Technical Background Report to the General Plan Safety Element, most of the city, including the Project site, is susceptible to high liquefaction potential. Provided that grading and other development plans for the Project site are designed in accordance with site-specific parameters for soils and geological conditions, Project-related impacts from seismic related ground failure will be less than significant (Mitigation Measure GEO.1).

⁷ Plate 1-1: Faults and Historical Seismicity Map, Technical Background Report to the Safety Element of the General Plan for the City of Coachella, prepared by Earth Consultants International, Inc. September 2014.

a.iv) No Impact. The Project site is not susceptible to landslides due to its relatively flat terrain and distance from mountainous slopes and hillsides (approximately 3 miles). No impact will occur.

b) Less than Significant Impact. Development of the Project site has the potential to result in the erosion of soils during site preparation, grading, and building construction. The surface soils are composed mainly of soft fine silty-sands, hard-pan clay, and loose sands with brittle calcium carbonate and salt deposits. Soils of this composition and consistency are prone to wind and water erosion. The site is essentially flat, thus minimizing the potential for water erosion. The site will be mostly covered by buildings, pavement or gravel at build out, minimizing long-term wind erosion potential.

Grading and construction may require removal of the topsoil; however, they would occur in accordance with erosion control requirements, including grading and dust control measures imposed by the City pursuant to grading permit regulations, including adherence to SCAQMD Rule 403.1, that requires a fugitive dust control plan. Specifically, Project construction would be required to comply with the City's Municipal Code Chapter 8.20 – Fugitive Dust Control, including submittal and approval of grading permits, site and building plans, and inspections to ensure that the Project does not generate excessive soil erosion. In addition, the Project will be required to prepare a Project-specific Water Quality Management Plan (WQMP) (See Section X, Hydrology and Water Quality). As part of the WQMP, Best Management Practices (BMPs) would be implemented during grading and construction to reduce sedimentation and soil erosion to the maximum extent practicable. Therefore, impacts would be less than significant.

c) Less than Significant with Mitigation.

Subsidence

Subsidence is the settlement or sinking of the land surface that, in the Coachella Valley, has been associated with long-term groundwater withdrawal. Subsidence is considered a regional issue and is being addressed by the water agencies and government agencies through water conservation and supplemental groundwater recharge efforts. Adherence to the recommendations provided in the geotechnical study will assure that impacts regarding subsidence will remain less than significant (Mitigation Measure GEO.1).

Landslide and Rockfall

See Response VII.a.iv, above.

Liquefaction and Dry Sand Settlement

See Response VII.a.iii, above.

Hydrocollapsible Soils

Hydrocollapsible soils are subject to collapse upon the introduction of water. The volume of collapsible soils reduces when the pores in the soil become saturated, causing loss of grain-to-grain contact. Collapsible soils can cause uniform or differential damage to foundations and walls built on this soil type. Adherence to the recommendations of the geotechnical report will assure that Project impacts associated with collapsible soils will remain less than significant (Mitigation Measure GEO.1).

- d) **Less than Significant with Mitigation.** The site's underlying soils consist of fine windblown sand, and heavily graded sand. The geotechnical report required by Mitigation Measures GEO.1 will provide recommendations that the Project should implement to assure these geotechnical issues are appropriately addressed, including removal and recompaction of collapsible or weak soils during the grading phase. Compliance with recommendations in the geotechnical report will ensure Project impacts are less than significant.
- e) **No Impact.** The subject property is in an urban area that is served by a community sewer system, and the proposed Project will be connected to the existing onsite sewer infrastructure and sewer system. The Project will not result in new septic tanks or alternative wastewater disposal systems. No impact will occur.
- f) **Less than Significant with Mitigation.** No significant cultural or paleontological resources were observed during the field survey conducted by APRMI on June 6, 2024 as part of the Phase 1 Archaeological and Paleontological Assessment. Results of the Paleontological Resources Records Check conducted by the Collections Manager of the Western Science Center indicate there are no known vertebrate fossil localities within the direct boundaries of the Project or within one mile of the Project, but that fossil localities have been found in similar sedimentary deposits to that of Project location nearby, including the Imagine Coachella Project, located 2.5 miles northwest of the Project area. The geologic unit underlying the Project area consists of Holocene-age alluvial units of sand, silt, and clay. While these sedimentary units are considered to be of high preservation value, their relatively modern date of deposition indicates that the presence of any fossil material is unlikely. However, if excavation disturbs deeper sedimentary units dating to the earliest Holocene or Pleistocene epochs, there would be high paleontological sensitivity.

Due to the high sensitivity of the Project area for paleontological resources, APRMI recommends that a qualified paleontologist be present on site to monitor any ground-disturbing activities, as described in Mitigation Measure GEO-2 through GEO-7. With implementation of these mitigation measures, potential impacts to paleontological resources will be reduced to less than significant levels.

Mitigation Measures:

- GEO-1** A site-specific Geotechnical Report shall be prepared and submitted with grading plans, and shall analyze site- and building-specific conditions to provide recommendations on soil compaction, seismic design and liquefaction. The report recommendations shall be incorporated in Project construction plans.
- GEO-2** Prior to the commencement of grading or excavation activities, the Lead Paleontologist shall be retained and create a Worker's Environmental Awareness Program (WEAP) pamphlet that will be prepared and provided by the Project Paleontologist during the training class to Project personnel, so they understand the regulatory requirements for the protection of paleontological resources. This training class shall include examples of paleontological resources to look for during Project excavation and the protocols to follow if discoveries are made.
- GEO-3** In the event that a paleontological resource is encountered when a monitor is not on site, all construction shall cease within at least 50 feet of the discovery and the Principal Investigator and/or Lead Paleontologist must be immediately notified. If the paleontological monitor is present at the time of discovery, then the monitor will have the authority to temporarily divert the construction equipment around the find until the Principal Investigator and/or Lead Paleontologist has assessed the resource for scientific significance. Work cannot resume in the direct area of the discovery until it is assessed by the Principal Investigator and/or Lead Paleontologist, and he/she indicates that construction can resume. Any soil that will be disturbed in Early Holocene or Late Pleistocene soils requires a construction monitor.
- GEO-4** In the event that significant paleontological resources are encountered, the Lead Paleontologist will implement the Paleontological Management Treatment Plan (PMTP) prepared for the Armtec Defense Products Co Master Plan Project. The purpose of the PMTP is to achieve compliance with the California Environmental Quality Act (CEQA), and local governmental agencies concerning the treatment of unexpected paleontological finds which are significant at the federal, state, and/or local level.
- GEO-5** If a paleontological discovery requires an excavation team or requires additional time to collect specimens, or the size of the discovery is more than a monitor can collect during standard daily monitoring services, a more intensive Discovery and Treatment Plan (DTP) may need to be developed and the area will be cordoned off and secured so that a paleontological resources excavation team, led by the Principal Investigator and/or Lead Paleontologist, may recover the fossil specimens out of that area once the DTP has been approved. Once the Principal Investigator and/or Lead Paleontologist has determined that the collection process is complete for a given area or locality, construction activity may resume in that localized area.

GEO-6 Once construction activities are complete, all fossil specimens collected will be prepared in a properly equipped paleontology laboratory to a point ready for curation. Laboratory preparation will include, but not be limited to, the careful removal of excess matrix from fossil remains, stabilizing and repairing specimens, identified to the lowest taxonomic level, analyzed, photographed, and catalogued before they are sent to the local repository for curation and permanent storage. Accompanying notes, maps, and photographs shall also be filed at the repository. The cost of curation is assessed by the repository and is the responsibility of the Project proponent.

GEO-7 At the conclusion of laboratory work and preparation for museum curation, a final (negative or positive) findings report will be prepared describing the results of the paleontological mitigation monitoring efforts associated with the project. The report will include a summary of the field and laboratory methods, an overview of the geology and paleontology in the project vicinity, a list of taxa recovered (if any), an analysis of fossils recovered (if any) and their scientific significance, and recommendations. If the monitoring efforts produced fossils, then a copy of the report will also be submitted to a designated museum repository.

Monitoring:

GEO-A The applicant shall provide the final grading and building plans to the Project geotechnical consultant for review and ensure the recommendations are incorporated into the design criteria and Project specifications as deemed appropriate by the consultant.

Responsible parties: Project engineer, Project geotechnical consultant, Project applicant, Planning Division, Engineering Department.

GEO-B Within 30 days of the completion of ground disturbing activities on the Project site, a report of findings shall be filed with the City. The paleo report will summarize the methods and results of the evaluation, including an itemized inventory and a detailed analysis of recovered resources, upon completion of the field and laboratory work.

Responsible parties: Project applicant, Lead Paleontologist/ paleontological monitor, Planning Division.

Source: Technical Background Report to the Safety Element of the General Plan for the City of Coachella, prepared by Earth Consultants International, Inc. September 2014; Website: Web Soil Survey. U.S. Department of Agriculture. Accessed August 2024.
<https://websoilsurvey.sc.egov.usda.gov/App/WebSoilSurvey.aspx>;

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

Setting

Air quality has become an increasing concern because of human health issues, but also because greenhouse gas emissions are contributing to global warming and climate change. The primary contributor to greenhouse gas emissions is the burning of fossil fuels through the use of automobiles, power and heat generators, and industrial processes.

The principal greenhouse gases (GHGs) include carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), ozone (O₃), and water vapor (H₂O), which are generated by both mobile and stationary sources, including vehicles, electricity and natural gas consumption, and emissions associated with water pumping and application of fertilizers.

The State of California has taken a leading role to curb GHG emissions and has developed laws and regulations to reduce these emissions. State legislation and regulations call for better integrated land use planning and curtailing energy production away from nonrenewable sources and toward new renewable sources, such as solar and wind. California SB 375 in part implements greenhouse gas reduction targets set forth in AB 32 and encourages regional land use planning to reduce vehicle miles traveled; it also requires jurisdictions to adopt a sustainable communities strategy. The California Air Resources Board continues to draft regulations to implement the Scoping Plan.

State law mandates that all cities decrease their GHG emissions to 1990 levels by the year 2020. The 2022 Scoping Plan provides CARB's update to the 2017 Plan. Pursuant to SB 32, the plan sets forth the state's plan to stay on track towards reducing GHG emission by at least 40 percent below 1990 levels by 2030. The 2022 Plan Update expands on earlier targets, establishing a new goal of reducing GHG emissions to 85 percent below 1990 levels by 2045. Additionally, the 2022 Plan Update establishes a path for the state to achieve carbon neutrality by 2045 through technologically feasible, cost-effective means.

The City of Coachella completed its first Greenhouse Gas Inventory in conjunction with the Climate Action Plan in 2015. The plan guides City policies and planning to achieve energy efficiency and comply with state mandates on emission reduction. The citywide GHG inventory determined that 2005 emissions totaled 312,628 metric tons CO₂e (MT CO₂e), which grew to 382,787 MT CO₂e (8.2 MT CO₂e per service population) in 2010. The Coachella Climate Action Plan (CAP) set a 49 percent reduction target from the 2010 per service population emission level by 2035, or 4.2 MT CO₂e per capita per year.

GHG Thresholds

On December 5, 2008, the SCAQMD formally adopted a greenhouse gas significance threshold of 10,000 MTCO₂e/yr that only applies to industrial uses' stationary sources where SCAQMD is the lead agency (SCAQMD Resolution No. 08-35). This threshold was adopted based upon an October 2008 staff report and draft interim guidance document that also recommended a threshold for all projects using a tiered approach.

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

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

The City currently uses this approach in considering project-specific greenhouse gas emissions under CEQA.

Discussion of Impacts

- a) Less Than Significant Impact.** The proposed Project will generate GHG emissions during both construction and operation. As described in Section III, Air Quality, above, the California Emissions Estimator Model (CalEEMod) Version 2022.1 was used to quantify air quality emission projections, including greenhouse gas emissions (Appendix B).

Construction

Construction activities will result in short-term GHG emissions associated with operation of construction equipment, employee commute, and other ground disturbing activities. As shown in Table 6, the project will generate 632 CO₂e

metric tons during the 18-month construction period. There are currently no construction-related GHG emission thresholds for projects of this nature. To determine if construction emissions will result in a cumulatively considerable impact, buildout GHG emissions were amortized over a 30-year period and added to annual operational emissions to be compared to applicable GHG thresholds (see Table 6, below).

Operation

At buildout, there are six emission source categories that will be contributing either directly or indirectly to operational GHG emissions, including energy/electricity usage, water usage, solid waste disposal, area emissions (pavement and architectural coating off-gassing), refrigerants, and mobile sources. Table 6 provides a summary of the projected short-term construction and annual operational GHG generation associated with buildout of the proposed Project.

According to the SCAQMD's recommended threshold Tier 3, a project would have a less than significant impact if it would be below an absolute threshold of 10,000 MTCO₂e/year for industrial (stationary source) projects or 3,000 MTCO₂e/year for residential and commercial projects. Industrial stationary sources could have multiple point sources of emissions usually associated with manufacturing and industrial processes, such as boilers, spray booths or degreasers. The Project is an expansion of an industrial facility; however, the proposed storage warehouses and production facilities are not considered a large stationary source polluter. Therefore, Project emission impacts were assessed using the 3,000 MTCO₂e/year threshold for commercial projects.

As shown in Table 6, the Project's total annual GHG emissions is projected to be 549.68 MTCO₂e and is therefore considered a less than significant impact.

Table 6 Projected GHG Emissions Summary (Metric Tons)	
Phase	CO₂e (MT/YR)
Construction	
Construction Total	632
Operation	
Area	1.14
Energy	196
Mobile	287
Waste	18.1
Water	25.6
Refrigerants	0.78
Construction: 30-year amortized ¹	21.06

Table 6 Projected GHG Emissions Summary (Metric Tons)	
Phase	CO ₂ e (MT/YR)
Total Operational	549.68
SCAQMD Threshold	3,000
Exceeds Threshold?	No
1. Buildout construction GHG emissions were amortized over 30-years then added to buildout operational GHG emissions. $632/30 = 21.06$	

b) No Impact. The city adopted a CAP in 2015 that outlines a series of GHG emission reduction strategies that include state policies and implementation programs, General Plan policies, and additional CAP measures.

State Programs: The California Climate Action Scoping Plan identifies State GHG reduction measures that would require no additional action from the City or the Project. These measures include:

- California Renewable Portfolio Standard
- Title 24 Building Codes
- Low Carbon Fuel Standard
- Clean Cars Standards – Pavley 1493

General Plan Policies: The Coachella General Plan includes specific policies that guide the City’s approach to reducing greenhouse gas emissions. For the CAP, policies were compiled from the Land Use (LU), Mobility (M), Sustainability and Natural Environment (SNE), Safety (S), and Infrastructure and Public Services (IPS) elements. The following policies apply to the Project:

- Energy performance targets – new construction (SNE 2.6)
- Alternative energy (SNE 2.3) (the Project will have access to renewable energy from an on-site solar array located on the northern parcel).
- Construction and demolition debris recycling (IPS 5.13)
- Water conservation performance targets for new construction (SNE 3.1)

The proposed Project is required to implement the above applicable GHG reduction measures and therefore would be consistent with the CAP. It should be noted that the majority of reduction measures provided in the CAP are dependent on third party actions, including the City and utility companies. Nevertheless, the proposed Project will be constructed in conformance with the California Building Code, which sets for stringent energy efficiency requirements and standards for new development that support the goals of the Statewide GHG reduction plans. Therefore, the Project is considered consistent with local and state GHG reduction measures, and impacts would be less than significant, and mitigation would not be required.

Conclusion Summary

The City's CAP and General Plan support and are consistent with the CARB 2017 Climate Change Scoping Plan and SCAG's 2024 RTP/SCS (also see Section III Air Quality). All components of construction and operation, including equipment, fuels, materials, and management practices, would be subject to the CAP, GPU policies, and current SCAQMD rules and regulations related to greenhouse gases, as discussed above. Based on these findings, the proposed Project will not conflict with an applicable plan, policy or regulation with the purpose of reducing GHG emissions and impacts will be less than significant.

Mitigation Measures: None.

Monitoring: None.

Source: City of Coachella Climate Action Plan, prepared by Raimi and Associates. Adopted April 22, 2015; CalEEMod Version 2022.1.

IX. HAZARDS AND HAZARDOUS MATERIALS Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?			X	
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?		X		
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?				X
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?				X
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?			X	
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?				X
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires.				X

Setting

The proper management of hazardous materials is a common concern for all communities within the Coachella Valley. Beginning in the 1970s, governments at the federal, state, and local levels became increasingly concerned about the effects of hazardous materials on human health and the environment. Numerous laws and regulations were developed to investigate and mitigate these effects. As a result, the storage, use, generation, transport, and disposal of hazardous materials are highly regulated by federal, state, and local laws and regulations.

In the City of Coachella, the use, storage, disposal, and cleanup of hazardous waste is regulated by an extensive framework of state and federal laws, such as those implemented by the US and California EPA, Occupational Safety and Health Administration, and regional agencies including the Colorado River Regional Water Quality Control Board. Coachella Fire Services, as part of the Riverside County Fire Department supports the Riverside County Health Department in maintaining a permit program that applies to anyone operating a hazardous occupancy or using, storing, or transporting substantial amounts of hazardous materials.

The Project site is surrounded by residential and agricultural development, some commercial uses, and vacant lots. The southern portion of the site is currently occupied by the existing Armtec facility, and the northern portion of the site is largely vacant with the exception of the Phase 1 solar array located on the eastern portion of the parcel.

A Phase I Environmental Site Assessment was prepared for the Project by Northgate Environmental Management, Inc. on August 5, 2024 (Appendix E), the results of which are discussed below.

Discussion of Impacts

- a) **Less than Significant Impact.** The Project proposes 37,800 SF in new storage facilities, 3,000 SF in new research and development/small production facilities, 15,000 SF in new production facilities, a ±73,200 SF truck staging area, and three retention basins.

Construction

Construction would involve the use of heavy equipment, which uses small amounts of oil and fuels and other potentially flammable substances. During demolition and construction, equipment would require refueling and minor maintenance on location that could lead to fuel and oil spills. The contractor will be required to identify a staging area for storing materials. The proposed project would not result in a significant risk of explosion or accidental release of hazardous substances. The use and handling of hazardous materials during construction activities would occur in accordance with applicable Federal, State, and local laws, including California Occupational Health and Safety Administration (CalOSHA) requirements.

Safety protocols established by the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) require the proposed buildings be constructed as a Type 4 magazine which consist of formed and poured concrete construction with reinforced roofs (ATF 27 CFR § 555.203 and 27 CFR § 555.210). The proposed buildings will be placed beyond the required safety distances for Hazard Class (HC) 1.4 “low explosives,” which require an inhabited-building distance (IBD) of 100 ft from inhabited buildings or public traffic routes.⁸ From the property line and/or public right-of-way, proposed Phase 2 structures are setback approximately ±230 feet south of Avenue 53, ±220 feet east of the soccer field, and ±169 feet west of Tyler Street. The nearest Phase 3 structure adjacent to a roadway (Tyler Street) would be setback a minimum distance of 100 feet.

Operation

Storage Warehouses: The storage warehouses are designed to house finished goods which consist of a Hazard Class 1.4 explosive material, which present no significant blast hazard. These are explosives that contain no more than 0.9 oz. (25 g) of a detonating material and where the effects are mainly confined to the package, and no projection fragments of substantial size or range are expected. Specifically, these warehouses will store empty combustible cartridge cases of various sizes with no propellant. The storage warehouse will remain unoccupied except when goods are moved in and out of the structure.

R&D Facilities: The R&D facility will be used to develop small quantities of combustible materials in various configurations. Hazardous materials will consist primarily of nitro-cellulose. No hazardous materials will be stored in the building. Occupancy of the Phase 2, 3,000 SF building will be strictly regulated, and occupancy is expected to be limited to approximately 8 persons. Ancillary storage containers measuring 40' x 8' x 8' may be placed in proximity to the Phase 2 R&D facility, however these storage containers would be for non-hazardous materials including tooling, spare parts, and packing materials.

Production Facilities: The production facility produces a variety of combustible ordnance products. These facilities include or contain research and development equipment, chemical evaluation laboratories, engineering services, quality control operations, high volume production, and safety and security services.

Materials placed in the warehouses will be finished goods produced at the on-site production facilities. Finished materials are placed in approved cardboard containers, boxes, and placed on a pallet. These pallets are then transferred from the production buildings located on the south lot via forklift. The forklift travels

⁸ Safety regulations per DoD 4145.26-M, DOD 6055.09-STD, DOD 5100.76M, California Code of Regulations, Title 8, Section 5189, Bureau of Alcohol Tobacco, Firearms and Explosives (ATF), Title 27 Part 555 & Title 29, Code of Federal Regulations, 1910.109

within the Project site avoiding public access and exposure. The physical security of proposed facilities and access points shall be in accordance with the Department of Defense Manual (DoDM 5100.76) specific to AA&E security (Arms, Ammunition, and Explosives). Finished goods are transferred from the warehouse to commercial carriers for final delivery to the customer. Regulations governing the handling and transportation of these materials include but are not limited to:

- ATF 27 CFR § 555.26 Prohibited shipment, transportation, receipt, possession, or distribution of explosive materials.
- ATF Title 18, United States Code, Sec. 1102, Chapter 40: Regulates the importation, manufacturing, distribution, and storage of explosive materials.
- CFR 49 Part 177 subpart B- Loading and Unloading of hazardous materials.
- CFR 49 177.835. DoT uses this regulation as a guide for transportation on public roadways.

Overall, the Project's transport, use, storage, and disposal of hazardous material shall comply with local, state, and federal regulations during construction and operation. Therefore, impacts from the routine transport, use or disposal of hazardous materials by the Project will be less than significant.

b) Less than Significant Impact with Mitigation: The Project site consisted of agricultural lands since at least 1949 through the late 1960s. By 1972 the site was partially developed with the current Armtec facility and facility expansions occurred around 1984, 1996, 2002, and 2006.

City records show that more than 30 years ago (pre-1992) accidental explosions and fires have occurred at the existing Armtec facilities and project site. However, no such accidents have occurred since, and the likelihood of similar accidents occurring is significantly reduced with adherence to local, state, and federal regulations regarding the routine transport, use, storage or disposal of hazardous materials [see response a), above].

A Phase I Environmental Site Assessment was prepared for the Project that recorded the following Recognized Environmental Condition (REC) on-site:

- An 8,000-gallon underground storage tank (UST) containing xylenes was present at the facility from 1992 until its removal in 2001. According to records obtained from Riverside County's Department of Environmental Health, one or more leaks from the former UST were reported between 1998 and 2001. The UST and associated piping were subsequently removed and investigations indicated that residual concentrations of benzene, ethylbenzene, toluene and xylenes were present in soil and that impacted soil extended to groundwater. BTEX concentrations were noted to be below regulatory cleanup levels; however, groundwater was noted to be

impacted with xylenes at concentrations that exceeded the California maximum contaminant level (MCL). The lack of closure documentation represents a REC.

The Phase I ESA did not reveal any Controlled RECs (CRECs) on the project site; however, the following Business Environmental Risks (BER) were identified:

- Due to the nature of the Armtec facility, manufacturing munitions including combustible ordnance and countermeasure products, for at least 52 years, the potential for subsurface contamination cannot be ruled out.
- The project site has consisted of agricultural land since at least 1949, and remained agricultural through the late 1960s, which can represent a potential for shallow subsurface impacts related to the potential historic use of pesticides, herbicides, and/or insecticides.

Based on the findings of the Phase I ESA, a limited Phase II ESA is required to mitigate impacts from potential exposure to the identified environmental hazards (Mitigation Measures HAZ-1). The limited Phase II ESA shall be performed in areas where development is planned on the southern parcel to evaluate potential impacts to shallow soil, and potential vapor encroachment concerns beneath proposed building footprints. If results of the Phase II ESA indicate there are impacts to soil, a soil management plan would be developed to manage any impacted soil appropriately during redevelopment. Similarly, if the Phase II ESA results indicate there are any vapor encroachment concerns that require mitigation, this would also be a recommendation of the Phase II ESA. Implementation of Mitigation Measures HAZ-1 would ensure the Project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving hazardous materials.

- c) No Impact:** There is no school located within ¼ mile of the Project site. Valley View Elementary School is the nearest school and is located approximately 0.50 miles west of the subject property. Project construction and operations would involve the use and storage of hazardous materials in accordance with manufacturers' instructions and handled in compliance with applicable federal, State, and local regulations. No impacts to schools would occur and no mitigation measures would be required.
- d) No Impact.** The Project site is currently occupied by the existing Armtec facility and is not included on a list of active hazardous sites compiled pursuant to Government Code Section 65962.5. The property is not listed on the Department of Toxic Substances Control (DTSC) EnviroStor website, nor is it listed on the State Water Resources Control Board (SWRCB) GeoTracker website. Therefore, the Project would not create a significant hazard to the public or the environment pursuant to Government Code Section 65962.5. No impact is expected.

- e) Less than Significant Impact.** The Project site is located approximately 1.3 acres north of the Jacqueline Cochran Regional Airport. The County of Riverside is responsible for the management and development of the Airport Land Use Compatibility Plan (ALUCP) for each public use and military airport in Riverside County. Each ALUCP identifies land use and noise level compatibility due to operations at airports as well as forecasted noise level contours based on future operations at each airport. These noise level contours and land use compatibility noise levels are used in determining whether a proposed land use is consistent with forecasted noise levels. The ALUCP for the Project site is the Jacqueline Cochran Regional Airport (JCRA) ALUCP.

The site is within Zone D of the ALUCP, which stipulates that so long as the density of the Project is restricted to 100 people/acre the potential conflict can be abated for non-residential uses within the zone. According to the noise impact analysis prepared for the Project (Appendix G), the Project lies outside of the 55 dBA CNEL contour for JCRA. This is below the noise compatibility standards of 55 dBA CNEL for exterior noise levels. Therefore, impacts due to aircraft noise would be less than significant.

The proposed Project is the expansion of the existing Armtec facility that has been in operation since the early 1970's. The Project does not propose new uses or activities not already occurring on-site and would not result in a safety hazard or excessive noise for people residing or working at the Project site. Impacts would be less than significant, and no mitigation measures would be required.

- f) No Impact.** The Project will not impair or interfere with the City Fire and Emergency Medical Services Master Plan (2007), City of Coachella Emergency Operations Plan (2007), and the City of Coachella Annex Local Hazard Mitigation Plan (2012). The Project site is accessed by Tyler Street, Avenue 53, and Grapefruit Boulevard/Highway 111. A construction traffic control plan may be required in coordination with the City's Engineering Department to ensure traffic safety and preservation of emergency/secondary access during all development activities. The site plans and emergency access for the Project will be subject to approval by the Fire and Police Departments to ensure adequate emergency access. No impact to emergency access or evacuation routes is anticipated.
- g) No Impact.** The Project site is not within or near a wildland fire hazard zone. There are no SRA, VHFHSZ, or any other designated fire hazard zones in the City. There is no substantial vegetation within the City to generate a high wildfire risk, and the Project site is not near wildlands. The Project will not expose people or structures to a significant risk associated with wildfire hazards. No impact will occur.

Mitigation Measures:

HAZ-1 Prior to the issuance of grading and building permits for the Phase 2 structures located on the southern parcel, a limited Phase II Environmental Site Assessment shall be performed in areas of the Project site where development is planned to evaluate potential impacts to shallow soil, and potential vapor encroachment concerns beneath proposed building footprints. All recommendations and mitigation measures in the forthcoming Phase II ESA shall be implemented by the Project. If results of the Phase II ESA indicate there are impacts to soil, a soil management plan would be developed to manage any impacted soil appropriately during redevelopment. Similarly, if the Phase II ESA results indicate there are any vapor encroachment concerns that require mitigation, this would also be recommendation of the Phase II ESA.

Monitoring:

HAZ-A The applicant shall provide the final limited Phase II ESA, and if required, the soil management plan and/or vapor encroachment mitigation plan, to the City for review prior to the issuance of grading permits to ensure the recommendations and mitigation measures set forth in the Phase II ESA are incorporated into the construction plans and Project design as deemed appropriate by the consultant.

Responsible parties: Project Phase II ESA consultant, Project applicant, Planning Division, Engineering Department.

Source: Phase I Environmental Site Assessment, Armtec Defense Technologies, prepared by Northgate Environmental Management, Inc. August 5, 2024; Envirostor, California Department of Toxic Substance Controls; State Water Resources Control Board (SWRCB) GeoTracker website; Noise Impact Analysis, Armtec Master Plan, prepared by Urban Crossroads, July 26, 2024.

X. HYDROLOGY AND WATER QUALITY Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?			X	
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?			X	
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:			X	
(i) result in substantial erosion or siltation on- or off-site;			X	
(ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;			X	
(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			X	
(iv) impede or redirect flood flows?			X	
(d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?				X
(e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?			X	

Setting

Domestic Water

Coachella Water Authority (CWA) currently provides domestic water to the Project site via water lines located immediately east of the Project site. CWA is a retail public water supplier that is administered and managed by the City of Coachella. CWA works with the Coachella Valley Water District (CVWD) to ensure a sufficient water supply for the region in a manner consistent with its Urban Water Management (UWMP).

Local water sources include groundwater from the Coachella Valley Groundwater Basin and imported supplies that replenish the aquifer. The primary source of domestic water is groundwater that is extracted from wells in the Indio Subbasin of the Coachella Valley Groundwater Basin. All groundwater is extracted via city owned and operated wells.

Wastewater

The City's wastewater conveyance and treatment services are operated by the Coachella Sanitary District (CSD) which was established in 1936 and maintains approximately 90 miles of wastewater conveyance pipeline, two pump stations, and a wastewater treatment plant. The diameter of the wastewater conveyance pipelines range from 4 to 54 inches. The two pump stations are: Coachella Valley High School Pump Station (CVHS PS) and Polk Street Pump Station (City of Coachella 2015 Sewer System Master Plan; Figure 2-1). The City's wastewater treatment plant is located at Avenue 54 and Polk Street and its capacity is 4.5 million gallon per day (MGD). The city also receives wastewater conveyance and treatment services through the Valley Sanitary District (VSD) for flows generated within the incorporated boundary; however, CSD is the primary service provider.

Flood Control

The Coachella Valley Stormwater Channel (CVSC) (known as the Whitewater River Stormwater Channel in the western Coachella Valley) is the primary drainage/surface water feature in the region. CVWD maintains and operates the CVSC and all regional drainage and flood control facilities within the city. The project site is located 1-mile southwest of the CVSC and lies within FEMA X Zone which indicates an area with minimal flood hazards (Map No. 06065C2270H). The City enforces standard requirements for the retention of storm flows and participates in the National Pollution Discharge Elimination System (NPDES) to ensure the protection of surface waters from pollution.

City of Coachella requires that runoff water stored on-site must be evacuated completely via infiltration within a period of 72 hours in order to comply with vector control concerns. To help facilitate this requirement, City of Coachella has limited the maximum depth of stored runoff within any basin to 3.5 feet and establishes a design infiltration rate for basin storage at 10 gal./SF/day (0.67 in/hr), thereby ensuring total evacuation of the basins via infiltration within the required period. A Preliminary

Hydrology Report was prepared for the Project that analyzes the site's drainage patterns and proposed on-site drainage design. (Appendix F).

Surface Water Quality

Water quality of regional surface water is largely dependent upon land uses that affect runoff, including agriculture and industrial land uses. Runoff produced by storms, agricultural irrigation, and urban activities can transport pollutants from the ground surface and have the potential to affect water quality in drainage channels. The CVSC, which drains to the Salton Sea, is the primary channel in Coachella.

Discussion of Impacts

- a) Less than Significant Impact.** A significant impact may occur if a Project discharges water which does not meet the quality standards of agencies that regulate surface or ground water quality and water discharge into stormwater drainage systems.

The site currently drains to the southern boundary to an existing retention basin located at the southeast corner of the site with overflow directed to adjacent roadways. City of Coachella requires that runoff water stored on-site must be evacuated completely via infiltration within a period of 72 hours in order to comply with vector control concerns. The Project proposes three new retention basins designed to meet the City's requirements for the retention of 100-year storm flows, with overflow directed to adjacent roadways.

All construction activities and long-term operation onsite must comply with the National Pollutant Discharge Elimination System (NPDES) permit program that requires pollution prevention measures to minimize the discharge of construction pollutants such as fuels, oils, and solvents. The City requires the preparation of a Water Quality Management Plan (WQMP), and the Storm Water Pollution Prevention Plan (SWPPP) for the Project, to address the construction and operational control of surface water pollution. The Project will also be required to comply with Regional Water Quality Control Board waste discharge requirements, including surface water pollution control, through the implementation of Best Management Practices, which will be reviewed and approved by the City prior to construction. Additionally, the CWA as a utility provider is mandated to comply with the Regional Water Quality Control Board standard which ensures and protects water quality.

The Project's proposed drainage system in connection with existing CWA infrastructure in adjacent roadways is in compliance with the NPDES and the City's regulation standards. The proposed development does not violate local, state, or federal water quality standards or regulations. For these reasons, the impact is expected to be less than significant.

b) Less than Significant Impact. The proposed Project will require potable water for use in research/production facilities, and the storage warehouses. The American Water Works Association Research Foundations (AWWARF's) Commercial and Industrial End Uses of Water and the U.S. Energy Information Administration's Commercial Buildings Energy Consumption Survey (CBECS) have determined water demand factors for land use categories similar to those proposed by the Project. As shown in the table below, the Project has the potential to generate a demand of 7.57 acre-feet per year.

Table 7 Water Demand at the Project Buildout				
Proposed Land Use	Square Footage	Water Consumption Factor	Water Demand (gpy)	Total Water Demand At buildout (AFY)
Warehouse/Storage	37,800	3.4 gal/SF/year	127,082	0.39
General Office (Production/Research Facility)	18,000	15 gal/SF/year	270,456	0.83
Landscape Estimate (rough)	97,000	Footnote 1 for Equation		6.35
TOTAL				7.57
1. Outdoor irrigation water demand equation is [SF x Evapotranspiration (ET _o) or ET _o Zone 4 from CVWD Landscape Ordinance 1302.5, Appendix C x Evapotranspiration Adjustment Factor (ETAF) x conversion factor] / 325,851. [97,000 x 76.46 x 0.45 x 0.62] / 325,851 = 5.45 AFY				

The Coachella Valley's largest water supply source is groundwater from the Whitewater River Basin. CWA works with five other Coachella Valley water suppliers to manage the underground water basins and to better serve the City and greater Coachella Valley. The proposed Project is consistent with the land use designation assigned to it in the General Plan, on which, in part, CWA based its future water demand analysis when contributing to the 2020 Coachella Valley Regional Urban Water Management Plan (RUWMP). According to the 2020 RUWMP, CWA anticipated a total water demand (deliveries) of 10,869 AF/year in 2025.⁹ The proposed Project represents 0.07 percent of the projected 2025 CWA water demand. The project will connect to existing on-site water lines. No new wells or additional water infrastructure are proposed. Therefore, project impacts associated with domestic water demand are expected to be less than significant.

The Project will be required to comply with the City and CWA's water-efficiency requirements, including the use of drought-tolerant planting materials and limited landscaping irrigation. Buildings will be equipped with water efficient fixtures in compliance with Building Code requirements to reduce water consumption.

⁹ Table 5-7. DWR 4-2R Projected Demands for Water (AF), 2020 Coachella Valley Regional Urban Water Management Plan, prepared by Water Systems Consulting, Inc. June 30, 2021

Implementation of these and other applicable requirements will assure that water-related impacts remain at less than significant levels.

c.i-iv) Less than Significant Impact. The Project site consists of generally flat terrain and contains no rivers or streams. The northern parcel is vacant and the southern parcel is developed with the existing Armtec facility. The proposed Project will increase impermeable surfaces onsite and, therefore, increase onsite storm flows.

The site currently drains to the southern boundary to an existing retention basin located at the southeast corner of the site with 169,929 cubic feet of stormwater storage volume, with overflow directed to perimeter streets. The Project proposes three retention basins to be constructed during Phase 2, including a 9,900 SF retention basin on the northern parcel and two retention basins totaling 65,750 SF on the southern parcel. According to the Preliminary Hydrology Report (Appendix F), the Project is required to provide for 18,216 cubic feet of additional 100-year stormwater retention on the northern parcel, and 9,142 cubic feet on the southern parcel. The proposed retention basins provide 21,778 cubic feet of retention on the northern parcel, and 32,822 cubic feet of retention on the southern parcel. The proposed basins meet the City's design requirements for the retention of storm flows. Runoff that exceeds the capacity of the on-site retention basin storage systems in an emergency overflow condition is designed to overflow onto perimeter public streets, Avenue 53 to the north and Tyler Street to the east, then east from Tyler Street following a dedicated drainage easement toward the Coachella Valley Stormwater Channel.

The proposed Project will be required to comply with the City's storm water retention requirements, including the approval of a project-specific final hydrology study and water quality management plan prior to the issuance of building permits. In addition, implementation of City required BMPs will reduce pollutants of concern that may enter nearby receiving waters and help reduce short and long-term water quality impacts caused by the construction and operation of the proposed Project. Approval of the WQMP, SWPPP, and the required BMPs will reduce impacts to surface waters by reducing erosion, siltation, and eliminating pollutants in storm flows. With the implementation of this standard requirement, the impacts to downstream water bodies associated with surface water pollution will be less than significant.

d) No Impact. The proposed Project site is not located in the vicinity of a body of water that can produce seiche, tsunami, or mudflow. The project site lies within FEMA X Zone which indicates an area of minimal flood hazards (Map No. 06065C2270H) and is not within a 100- to 500-year flood zone, thus reducing the chance of releasing pollutants due to flooding. Impacts are expected to be less than significant.

e) **Less Than Significant Impact.** The CWA follows the California Regional Water Quality Control Board regulations and the NPDES permit program that requires pollution prevention measures to minimize the discharge of construction pollutants such as fuels, oils, and solvents. The City requires the preparation of a Water Quality Management Plan (WQMP), and the Storm Water Pollution Prevention Plan (SWPPP) for the Project, to address the construction and operational control of surface water pollution. The Project is consistent with the General Plan land use designation assigned to the property, and its anticipated water demand is addressed in the 2020 Coachella Valley regional UWMP. Therefore, it will not conflict with a sustainable groundwater management plan. Adherence to the City's standard requirements related to water quality will ensure there will be no impacts to a water quality control plan because the Project will implement BMPs through its SWPPP and WQMP to reduce surface water quality impacts. These standard requirements assure that impacts will be less than significant.

Mitigation Measure: Mitigation not required.

Monitoring: Monitoring not required.

Source: Preliminary Hydrology Report, Armtec Defense Technologies, prepared by The Altum Group, February 3, 2025; FEMA Map No. 06065C2270H.

XI. LAND USE AND PLANNING Would the project:	Potentially Significant Impact	Less Than Significant w/ Mitigation	Less Than Significant Impact	No Impact
a) Physically divide an established community?				X
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?			X	

Setting

The City of Coachella and SOI consist of urban settlement (residential, industrial, and commercial land uses), agricultural land, open space, and undeveloped land. Most of the urban and residential development is within the western City, including Coachella’s downtown, civic buildings, commercial corridors, and major residential development. The eastern City and SOI consist mostly of open space, agriculture, and tribal land.

The northern parcel is designated “Urban Employment” on the 2035 General Plan land use map and is zoned for “Urban Employment” (U-E). The southern parcel is designated “Industrial District” on the General Plan land use map and zoned for “Heavy Industrial (M-H).” These land use designations provide for a range of employment opportunities and accommodates higher concentrations of heavy business activity.

The property is also within the General Plan Airport District Subarea. The Airport District is one of the primary industrial areas of the city. The Project site is in Zone D of the Jacqueline Cochran Airport Land Use Compatibility Plan.

Discussion of Impacts

a) No Impact. The northern parcel of the Project site is largely vacant with exception of the Phase 1 solar array on the eastern portion, and the southern parcel contains the existing Armtec facilities. The surrounding area is a mix of residential, commercial, agricultural, and vacant lots. All commercial uses and residential communities operate independently and will not be divided by the Project. The Project will not physically divide an established community.

b) Less Than Significant Impact.

General Plan

The Project site is designated as Urban Employment and Industrial District in the General Plan. The intent and purpose of the Urban Employment Center is to provide a range of employment uses to help expand and diversify the City's

economy and transform Coachella from a small town into a full-service city. Urban employment centers are the primary location for office and professional jobs, supported by retail, services and homes. The intent and purpose of the Industrial District is to provide a range of light and heavy commercial and industrial businesses. The Project proposes the expansion of the existing Armtec facilities, which is consistent with the industrial land uses described in Industrial District land use designation.

Among the Project's goals are ensuring high-quality development within the Project area and expanding the production and storage capabilities of the existing Armtec facility. It is also consistent with the following General Plan Safety Element and Land Use and Community Character Element goals and policies:

Safety Element

Goal 5. Hazardous Materials Management. A community that has reduced the potential for hazardous materials contamination

Policies

- 5.3 Hazardous materials siting.** Prohibit the placement of proposed new facilities that will be involved in the production, use, storage, transport or disposal of hazardous materials near existing land uses that may be adversely affected by such activities. Conversely, prohibit the development of new sensitive facilities (like schools, child-care centers, nursing homes, senior housing, etc.) near existing sites that use, store or generate hazardous materials

Consistency Analysis: As discussed in Section IX Hazards and Hazardous Materials response a), Safety protocols established by the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) require the proposed buildings be constructed as a Type 4 magazine which consist of formed and poured concrete construction with reinforced roofs (ATF 27 CFR § 555.203 and 27 CFR § 555.210). The proposed buildings will be placed beyond the required safety distances for Hazard Class (HC) 1.4 "low explosives," which require an inhabited-building distance (IBD) of 100 ft from inhabited buildings or public traffic routes.¹⁰ From the property line and/or public right-of-way, proposed Phase 2 structures are setback approximately ±230 feet south of Avenue 53, ±220 feet east of the soccer field, and ±169 feet west of Tyler Street. The nearest Phase 3 structure adjacent to a roadway (Tyler Street) would be setback a minimum distance of 100 feet.

¹⁰ Safety regulations per DoD 4145.26-M, DOD 6055.09-STD, DOD 5100.76M, California Code of Regulations, Title 8, Section 5189, Bureau of Alcohol Tobacco, Firearms and Explosives (ATF), Title 27 Part 555 & Title 29, Code of Federal Regulations, 1910.109

- 5.5 Hazardous materials transport routes.** Identify roadways along which hazardous materials are routinely transported and if schools, medical facilities, child-care centers or other facilities with special evacuation needs are located along these routes, the City, together with these facilities, will identify emergency response actions that can be implemented if a roadway accident results in the unauthorized release of hazardous materials.

Consistency Analysis: The applicant is required to submit a hazardous materials transport route plan identifying truck routes anticipated for the Project. The City has requested that outreach efforts be conducted to any schools, medical facilities, child-care centers, or other facilities with special evacuation needs along these routes.

Land Use and Community Character Element

- Goal 7. Districts. A series of unique, destination-oriented districts throughout Coachella that provide space for large-format retail, industrial and resort uses in order to increase access to jobs, provide amenities for residents and improve the fiscal stability of the City.**

Policies

- 7.2** Industrial expansion. Actively seek to expand the amount of industrial uses in Coachella as a source of jobs and economic development. Industrial uses should be focused in subareas 5, 7 and 8
- 7.4** Impact of industrial development. Require new development within the City's industrial districts be designed for compatibility with surrounding uses to minimize impact and cultivate connectivity with each district.
- 7.5** Industrial compatibility. Where industrial uses are near existing and planned residential development, require industrial projects be designed to limit the impact of truck traffic on residential areas.

Consistency Analysis: The Project proposes the expansion of the existing Armttec facilities, located within subarea 5, and will be designed in accordance with the following General Plan policies identified by the City during the Pre-Application Review process:

Urban Employment Center Policies

- Streets should be designed for slow speeds, convenient curbside parking and easy and safe pedestrian crossing.
- High-branching deciduous trees with relatively open canopy structure are recommended to increase the visibility of buildings and signage. Palms can provide vertical accents in selected locations but should generally be used in combination with canopy trees that provide welcome shade.
- Building heights are generally two to five stories.
- Services and trash should be located behind the buildings in alleys or rear parking areas.
- Concrete buildings—including good quality tilt-up buildings designed with appropriate urban facades—as well as buildings clad with metal are appropriate in the Urban Employment zone.

Industrial District Policies

- Within multi-building complexes or campuses – whether designed for large users or as a multitenant industrial development – the major drives should be designed as small streets, defined by rows of “street trees” to project the image of valuable business addresses.
- Rows of deciduous trees are recommended along the private streets and within the parking fields to provide shade.
- Buildings should face the street with simple, attractive facades with main entries and windows, welcoming visitors, providing light and view for the occupants and animating the architecture.
- Buildings may be set back from the street with appropriate landscaping to provide an attractive visual buffer.
- Loading functions should be located toward the rear of the property. Employee parking lots should also be located beside or behind buildings when possible rather than in front.
- Simple modern masonry and concrete architecture is recommended. Large buildings should be organized into multiple simple masses and articulated with fenestration. Galleries, arcades, and projecting sunscreens are recommended architectural elements, providing valuable shade and visual depth to the architecture.
- Natural masonry, concrete and metal materials that weather and age with grace, are recommended.

General

- Require architecture, building materials and landscape design to respect and relate to the local climate, topography, history, and building practices.

- Walkable streets. Regulate new development to ensure new blocks encourage walkability by maximizing connectivity and route choice, create reasonable block lengths to encourage more walking and physical activity and improve the walkability of existing neighborhood streets
- Parking Lots shall not dominate the frontage of Urban Employment Centers.
- Establish an interconnected open space network throughout Coachella that serves as a network for active transportation, recreation and scenic beauty and connects all existing and future areas of the City. In particular, connections should be made between preserved open spaces, parks, the Downtown, Neighborhood Centers and other destinations within the City.
- Improve health outcomes by creating a safe and convenient circulation system for pedestrians that focuses on crosswalks.
- Pedestrian network. Improve health outcomes by creating a safe and convenient circulation system for pedestrians that focuses on crosswalks, improves the connections between neighborhoods and commercial areas, provides places to sit or gather, pedestrian-scaled street lighting, buffers from moving vehicle traffic, etc.

Zoning

The Project has been developed in accordance with City regulations and development standards as provided in its zoning code. The proposed industrial land uses are allowed under permitted and conditionally permitted developments for U-E and M-H zoning districts. Phase 2 includes a Conditional Use Permit (CUP 389) to allow the storage warehouse building and truck staging area on the northern parcel zoned U-E, and for the R&D building on the southern parcel zoned M-H. Therefore, because the proposed industrial are either permitted or conditionally permitted with permits, and development is in accordance with applicable development standards with the Zoning Code, there is no conflict.

Airport Land Use Compatibility Plan

The Project site is located approximately 1.3 acres north of the Jacqueline Cochran Regional Airport. The site is within Zone D of the Airport Land Use Compatibility Plan. Industrial use intensities in Zone D are limited to less than 100 people per acre.¹¹ Currently Armtec employs a total of 309 people, which is equivalent to 6 (5.87) employees per acre (52.65-acre site). The operation of the proposed buildings will be managed by existing staff, and the Project does not include plans to hire additional employees. Therefore, the Project would not exceed the industrial employment limit of 100 people per acre for projects located in Zone D of the Airport Land Use Compatibility Plan.

¹¹ Riverside County Airport Land Use Compatibility Plan Policy Document – East County Airports Background data. Chapter 3, JC. Jacqueline Cochran Regional Airport, pg. 3-18.

Summary

The proposed Project supports the General Plan's policies regarding the development of industrial projects in the Airport District, and does not exceed the employee limit for industrial projects located in Zone D of the Airport Land Use Compatibility Plan. Therefore, the proposed Project will be consistent with adopted plans and programs and impacts to land use policy are expected to be less than significant.

Mitigation Measures: None.

Monitoring: None.

Source: Riverside County Airport Land Use Compatibility Plan Policy Document – East County Airports Background data. Amended September 2006). Coachella 2035 General Plan, Land Use and Community Character Element.

XII. MINERAL RESOURCES Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?				X
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?				X

Setting

The California Mineral Land Classification System, developed by the State Geologist, identifies Mineral Resources Zones (MRZs) for mapping and reporting purposes under the Surface Mining and Reclamation Act (SMARA). The western portion of the City, including the Project site, is classified as MRZ-1, where available geological information indicates that little likelihood exists for presence of significant mineral resources. The northeastern portion of the City is classified as MRZ-3, which indicates the area has known mineral deposits that may qualify as mineral resources (MRZ-3a), or the area may have inferred deposits which may qualify as mineral resources (MRZ-3b). Two permitted mining operations occur in the MRZ-2 area in the SOI, but none occur in the City.

Discussion of Impacts

a, b) No Impact. Most of the Project site is currently occupied by the existing Armttec facility. The Project area is located in a State-designated Mineral Resource Zone MRZ-1, which is defined as an area “where available geological information indicates that little likelihood exists for presence of significant mineral resources.” The Project site occurs in an urban setting and is not designated for mineral resource extraction; therefore, the Project would not result in the loss of availability of a mineral resource or a mineral resource recovery site. No impacts would occur and no mitigation measures would be required.

Mitigation Measures: None.

Monitoring: None.

Source: City of Coachella General Plan Update, Environmental Impact Report, SCH #: 2009021007. July 2014.

XIII. NOISE Would the project result in:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
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?			X	
b) Generation of excessive groundborne vibration or groundborne noise levels?			X	
c) For a project located within the vicinity of a primary 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?			X	

Setting

Traffic is the predominant source of noise in the City of Coachella, with other major noise sources including the railway, manufacturing processing and distribution facilities. Other, less significant noise sources in Coachella include aircraft overflights, air conditioning units and other mechanical equipment on buildings, and landscaping equipment.

A Project-specific Noise Impact Analysis was prepared by Urban Crossroads in July 2024 (Appendix G). The following Tables present the exterior dBA CNEL traffic noise levels under existing (2024) conditions and existing plus ambient growth plus cumulative (EAC) 2026 without Project conditions within the larger Project area. The noise contours represent the distance to noise levels of a constant value and are measured from the center of the roadway for the 70, 65, and 60 dBA CNEL noise levels.

**Table 8
Existing 2024 Without Project Noise Level Contours**

ID	Road	Segment	CNEL at Receiving Land Use (dBA) ¹	Distance to Contour from Centerline (Feet)		
				70 dBA CNEL	65 dBA CNEL	60 dBA CNEL
1	Tyler St.	s/o Grapefruit Blvd.	70.2	41	88	190
2	Tyler St.	s/o Avenue 53	69.3	36	77	166
3	Tyler St.	s/o Armttec Entrance	68.2	30	65	141
4	Palm St.	s/o Grapefruit Blvd.	62.5	9	20	44
5	Grapefruit Blvd.	w/o Tyler St.	76.4	81	174	374
6	Grapefruit Blvd.	w/o Palm St.	75.2	67	145	312
7	Grapefruit Blvd.	e/o Palm St.	72.3	43	93	200
8	Airport Blvd.	w/o Palm St.	72.0	62	134	289

¹ 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.

**Table 9
EAC 2026 Without Project Noise Level Contours**

ID	Road	Segment	CNEL at Receiving Land Use (dBA) ¹	Distance to Contour from Centerline (Feet)		
				70 dBA CNEL	65 dBA CNEL	60 dBA CNEL
1	Tyler St.	s/o Grapefruit Blvd.	70.5	43	93	200
2	Tyler St.	s/o Avenue 53	69.6	38	81	174
3	Tyler St.	s/o Armttec Entrance	68.5	32	69	148
4	Palm St.	s/o Grapefruit Blvd.	64.1	12	26	56
5	Grapefruit Blvd.	w/o Tyler St.	76.7	84	180	388
6	Grapefruit Blvd.	w/o Palm St.	75.9	74	159	342
7	Grapefruit Blvd.	e/o Palm St.	73.0	48	103	221
8	Airport Blvd.	w/o Palm St.	72.4	66	142	307

¹ 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.

The noise analysis also recorded existing noise measurements for five receiver locations in proximity to the Project site to determine baseline ambient noise conditions.

Table 10 24-Hour Ambient Noise Level Measurements			
Receiver	Location	Energy Average Hourly Noise Level (dBA Leq)²	
		Daytime	Nighttime
R1	Located west of the site near the residence at 53330 Shady Ln. approximately 1,363 feet west of Project site.	49.5	45.3
R2	Located south of the site near the residence at 85755 Avenue 54 approximately 1,403 feet south of Project site.	64.4	62.2
R3	Located east of the site near the residence at 53460 Tyler St. approximately 100 feet east of Project site.	64.4	64.0
R4	Located east of the site near the residences at 53450 Tyler St. approximately 114 feet east of Project site.	63.0	61.8
R5	Located north of the site near the residence at 85925 Avenida Raylynn approximately 102 feet north of Project site.	65.5	63.6

Noise impacts shall be considered significant if any of the following occur as a direct result of the proposed Project.

Table 11 Noise Significance Criteria Summary				
Analysis	Land Use	Condition(s)	Significance Criteria	
			Daytime	Nighttime
Offsite Noise	Noise-Sensitive	if ambient is < 60 dBA Leq ¹	≥ 5 dBA Leq Project increase	
		if ambient is 60 - 65 dBA Leq ¹	≥ 3 dBA Leq Project increase	
		if ambient is > 65 dBA Leq ¹	≥ 1.5 dBA Leq Project increase	
Aircraft	All	Exterior Noise Level Standards ²	See Exhibit 3-C	
Operational Noise	Noise-Sensitive	Exterior Noise Level Standards ³	55 dBA Leq	45 dBA Leq
		if ambient is < 60 dBA Leq ¹	≥ 5 dBA Leq Project increase	
		if ambient is 60 - 65 dBA Leq ¹	≥ 3 dBA Leq Project increase	
Construction Noise & Vibration	Permitted Construction Hours ⁴	October 1st to April 30th 6:00 a.m. to 5:30 p.m. Mondays to Fridays	May 1st to September 30th 5:00 a.m. to 7:00 p.m. Mondays to Fridays	
		All Year: 8:00 a.m. to 5:00 p.m. Saturdays, Sundays, and holidays		
	Noise-Sensitive	Noise Level Threshold ⁵	80 dBA Leq	n/a
		Vibration Level Threshold ⁶	0.30 PPV (in/sec)	n/a

¹ Source: FICON, 1992.

² Source: Riverside County ALUCP, 2004

³ Source: City of Coachella Municipal Code, Section 7.04.030 (A).

⁴ Source: City of Coachella Municipal Code, Section 7.04.070.

⁵ Source: Federal Transit Administration, Transit Noise Vibration Impact Assessment Manual.

⁶ Source: U.S. Department of Transportation Federal Transit Administration, Transit Noise and Vibration Impact Assessment, May 2006.

"Daytime" = 6:00 a.m. to 10:00 p.m.; "Nighttime" = 10:00 p.m. to 6:00 a.m.; "n/a" = No nighttime operation is anticipated at the Project site and no nighttime construction activity is permitted, and therefore, no nighttime noise level thresholds are identified.

The Project is located within Zone D of the Jacqueline Cochran Regional Airport (JCRA) Airport Land Use Compatibility Plan (ALUCP), which identifies land use and noise level compatibility due to operations at airports as well as forecasted noise level contours based on future operations at each airport.

Discussion of Impacts

- a) **Less than Significant Impact.** The Project site is largely developed with the existing Armtec facility. The main noise source in the area is vehicular traffic accessing the site and on Tyler Street and Avenue 53. The surrounding area mainly consists of residential development and agricultural or vacant fields. The nearest sensitive receptors are the residences immediately east of Tyler Road, approximately 100 feet east of the Project site at their closest point.

Construction Noise

Noise generating construction activities would include site preparation, excavation, grading, the construction and finishing of the proposed buildings, and paving. Noise levels surrounding the Project site could be elevated for short periods of time, as equipment moves through the site. These noise levels would be limited to the less sensitive daytime hours and would cease once building construction began. Project construction will temporarily increase ambient noise levels from the operation of heavy equipment and machinery. Grading, construction, paving, and other development activities will involve the operation of graders, excavators, bulldozers, dump trucks, and similar equipment. Heavy equipment can generate noise levels ranging from 70 to 90 dBA at 50 feet from the source. The Federal Transit Administration (FTA) considers a daytime exterior construction noise level of 80 dBA L_{eq} as a threshold for noise sensitive residential land use, and a noise level of 85 dBA L_{eq} for commercial locations.

The construction noise analysis determined that the nearest receiver locations would satisfy the reasonable daytime 80 dBA L_{eq} significance threshold during Project construction activities as shown in the Table below. Therefore, the noise impacts due to Project construction noise are considered less than significant at all receiver locations.

Table 12 Construction Noise Level Compliance			
Receiver Location	Construction Noise Levels (dBA L_{eq})		
	Highest Construction Noise Levels	Threshold	Threshold Exceeded?
R1	48.6	80	No
R2	47.5	80	No
R3	58.1	80	No
R4	58.3	80	No
R5	58.6	80	No

Source: Table 11-3 of Noise Impact Analysis.

Off-Site Traffic Noise Impacts

During long-term operation, the Project will permanently increase ambient noise levels in the Project area. Noise will be generated by vehicles accessing the site, mechanical equipment (such as HVAC units), and landscaping equipment.

Table 8 presents the Existing 2024 without Project conditions, expected to range from 62.5 to 76.4 dBA CNEL, and Table 9 presents the EAC 2026 without Project conditions, expected to range from 64.1 to 76.7 dBA CNEL. As shown in Table 13 and Table 14, the addition of the Project will generate a noise level increase of up to 0.2 dBA CNEL on the study area roadway segments under both existing and EAC conditions. Based on the significance criteria in Table 11 for off-site traffic noise impacts, the Project-related noise level increases are considered less than significant under Existing conditions at the land uses adjacent to roadways conveying Project traffic.

Table 13 Existing Off-Site Project-Related Noise Impacts							
ID	Road	Segment	CNEL at Receiving Land Use (dBA) ¹			Incremental Noise Level Increase Threshold	
			No Project	With Project	Project Addition	Limit	Exceeded?
1	Tyler St.	s/o Grapefruit Blvd.	70.2	70.4	0.2	1.5	No
2	Tyler St.	s/o Avenue 53	69.3	69.5	0.2	1.5	No
3	Tyler St.	s/o Armtec Entrance	68.2	68.2	0.0	1.5	No
4	Palm St.	s/o Grapefruit Blvd.	62.5	62.6	0.1	3.0	No
5	Grapefruit Blvd.	w/o Tyler St.	76.4	76.5	0.1	1.5	No
6	Grapefruit Blvd.	w/o Palm St.	75.2	75.3	0.1	1.5	No
7	Grapefruit Blvd.	e/o Palm St.	72.3	72.4	0.1	1.5	No
8	Airport Blvd.	w/o Palm St.	72.0	72.0	0.0	1.5	No

¹ The CNEL is calculated at the boundary of the right-of-way of each roadway and the property line of the receiving land use.

Table 14 EAC Off-Site Project-Related Noise Impacts							
ID	Road	Segment	CNEL at Receiving Land Use (dBA) ¹			Incremental Noise Level Increase Threshold	
			No Project	With Project	Project Addition	Limit	Exceeded?
1	Tyler St.	s/o Grapefruit Blvd.	70.5	70.7	0.2	1.5	No
2	Tyler St.	s/o Avenue 53	69.6	69.8	0.2	1.5	No
3	Tyler St.	s/o Armtec Entrance	68.5	68.6	0.1	1.5	No
4	Palm St.	s/o Grapefruit Blvd.	64.1	64.1	0.0	3.0	No

ID	Road	Segment	CNEL at Receiving Land Use (dBA) ¹			Incremental Noise Level Increase Threshold	
			No Project	With Project	Project Addition	Limit	Exceeded?
5	Grapefruit Blvd.	w/o Tyler St.	76.7	76.7	0.0	1.5	No
6	Grapefruit Blvd.	w/o Palm St.	75.9	75.9	0.0	1.5	No
7	Grapefruit Blvd.	e/o Palm St.	73.0	73.0	0.0	1.5	No
8	Airport Blvd.	w/o Palm St.	72.4	72.4	0.0	1.5	No

¹ The CNEL is calculated at the boundary of the right-of-way of each roadway and the property line of the receiving land use.

Operational Noise Impacts

The Project would generate noise from on-site operational activities, including roof top air conditioners and a truck staging/loading area. The operational noise levels related to the roof top air conditioners and a truck staging/loading area associated with the Project are considered exempt from the City of Coachella Municipal Code noise standards. However, to demonstrate compliance with CEQA Guidelines, the noise analysis evaluated the potential operational noise levels against the City of Coachella Municipal Code exterior noise standards at the closest noise-sensitive receiver locations.

The noise analysis includes a noise prediction model that utilizes the CadnaA (Computer Aided Noise Abatement) computer program, that calculates the distance from each noise source to the five noise receiver locations identified, 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. The Table below shows that the Project-related operational noise levels at the closest sensitive receiver locations will range from 17.2 to 48.4 dBA L_{eq} and will satisfy the residential daytime 55 dBA L_{eq} and nighttime 45 dBA L_{eq} noise level standards of the City of Coachella Municipal Code.

Receiver Location ¹	Project Operational Noise Levels (dBA L_{eq})		Noise Level Standards (dBA L_{eq})		Threshold Exceeded?	
	Day	Night	Day	Night	Day	Night
R1	48.4	17.2	55	45	No	No
R2	41.0	19.4	55	45	No	No
R3	44.4	34.4	55	45	No	No
R4	46.5	37.2	55	45	No	No

Table 15 Operational Noise Level Compliance						
Receiver Location¹	Project Operational Noise Levels (dBA Leq)		Noise Level Standards (dBA Leq)		Threshold Exceeded?	
	Day	Night	Day	Night	Day	Night
R5	46.8	21.8	55	45	No	No

¹ See Table 10 for the receiver locations.

The noise analysis also assessed the Projects operational noise level contributions by combining the Project operational noise levels with the existing ambient noise levels measurements for the off-site receiver locations potentially impacted by Project operational noise sources. Noise levels that would be experienced at receiver locations when Project-source noise is added to the ambient daytime and nighttime conditions are presented in Tables 16 and 17, respectively. As shown in the tables below, Project operational stationary-source noise would not result in a substantial temporary/periodic, or permanent increase in ambient noise levels in the Project vicinity above levels existing without the Project and impacts in these regards will be less than significant.

Table 16 Daytime Operational Noise Level Contribution (DBA Leq)						
Receiver Location	Total Project Operational Noise Level²	Reference Ambient Noise Levels⁴	Combined Project and Ambient⁵	Project Increase⁶	Increase Criteria⁷	Increase Criteria Exceeded?⁷
R1	48.4	49.5	52.0	2.5	5.0	No
R2	41.0	64.4	64.4	0.0	3.0	No
R3	44.4	64.4	64.4	0.0	3.0	No
R4	46.5	63.0	63.1	0.1	3.0	No
R5	46.8	65.5	65.6	0.1	1.5	No

Table 17 Nighttime Operational Noise Level Contribution (DBA Leq)						
Receiver Location	Total Project Operational Noise Level²	Reference Ambient Noise Levels⁴	Combined Project and Ambient⁵	Project Increase⁶	Increase Criteria⁷	Increase Criteria Exceeded?⁷
R1	17.2	45.3	45.3	0.0	5.0	No
R2	19.4	62.2	62.2	0.0	3.0	No
R3	34.4	64.0	64.0	0.0	3.0	No
R4	37.2	61.8	61.8	0.0	3.0	No
R5	21.8	63.6	63.6	0.0	3.0	No

- b) Less than Significant Impact.** Groundborne vibration and/or groundborne noise will be produced by heavy equipment during the construction phase of the Project. Operation of construction equipment causes ground vibrations that spread through the ground and diminish in strength with distance. Ground vibration levels associated with various types of construction equipment including bulldozers, jackhammers, loaded trucks and vibratory rollers range from 0.003 to 0.210 PPV (in/sec) at a distance of 25 feet. The nearest sensitive noise and vibration receivers are located between 50 feet (during construction of off-site improvements) to 1,403 feet from the building façade to the Project construction activities. At these distances, construction vibration velocity levels are estimated to range from less than 0.01 up to 0.03 (in/sec). Based on the maximum acceptable continuous vibration threshold of 0.30 PPV (in/sec), the typical Project construction vibration levels will fall below the building damage thresholds at all noise sensitive receiver locations. Therefore, the Project-related vibration impacts are considered less than significant during typical construction activities at the Project site.
- c) Less than Significant Impact.** The Jacqueline Cochran Regional Airport (JCRA) is located approximately 1.3 miles south of the Project site. The Project is within Zone D of the Riverside County ALUCP compatibility zones and the ALUCP stipulates that so long as the density of the Project is restricted to 100 people/acre the potential conflict can be abated for non-residential uses within the zone. The Project lies outside of the 55 dBA CNEL contour for JCRA and is therefore below the compatibility standards of 55 dBA CNEL as shown on the significance criteria table (Table 11). Therefore, impacts due to aircraft noise would be less than significant.

Mitigation Measures: None required.

Monitoring: None required.

Source: Armtec Master Plan Noise Impact Analysis, prepare by Urban Crossroads, July 2024.

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

Setting

According to the California Department of Finance, the population of the City of Coachella was estimated to be 43,173 (2024). The City housing stock is composed of a mix of single-family and multi-family development, but the majority (70.8 percent) of housing units are single-family detached homes.

Discussion of Impacts

- a) **No Impact.** The Project proposes the expansion of the existing Armtec facility resulting in additional storage warehouses, production space and truck parking. No new homes, businesses, or extensions of public roads or other infrastructure are proposed. The Project site is designated Urban Employment and Industrial District in the General Plan; therefore, the site is not part of planned population growth in the city. The Project is consistent with this designation and, therefore, there are no impacts associated with population growth.
- b) **No Impact.** The subject property is currently occupied by Armtec facilities, and the proposed Project would not displace any existing housing or persons or require the construction of housing elsewhere. No impact will occur.

Mitigation Measures: None.

Monitoring: None.

Source: California Department of Finance 2024 data on City/County Population and Housing Estimates.

XV. PUBLIC SERVICES

Would the project result in:
 Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

Potentially Significant Impact **Less Than Significant with Mitigation** **Less Than Significant Impact** **No Impact**

Fire protection?			X	
Police protection?			X	
Schools?			X	
Parks?			X	
Other public facilities?			X	

Setting

Fire Protection

Fire protection services are provided by the Riverside County Fire Department and CalFire via a cooperative agreement. In relation to the site, the nearest Fire Department is Fire Station 79 location at 1377 6th Street, Coachella, approximately 1 mile northwest. The Riverside County Fire Department Station 79 is staffed by 18 full time personnel (with a minimum of six firefighters on duty at all times), 10 volunteer firefighters, and 10 explorer cadets. The department is a full-service public safety department which has provided fire suppression and emergency medical services to Coachella residents, businesses and visitors since 1990. During 2009 the Department responded to a total of 1,697 calls for service in the City.

The City may consider new stations to serve the growing entertainment district and northern area as well as the central area in the future as development occurs. The City's fire codes and measures follow the California Fire Code (Title 24, Part 9) establishing practices for safeguarding life and property from fire related disasters.

Police Protection

The Riverside County Sheriff's Department is contracted to provide comprehensive law enforcement services through the City of Coachella Police Department. The Riverside County Sheriff Thermal Station is located at 86625 Airport Boulevard in Thermal, approximately 1.5 miles southeast of the Project site.

The City Police Department is comprised of the Investigations, Patrol, Traffic, and Forensics Divisions with overlapping personnel. The Department consists of 32 sworn officer positions, 19 of which are dedicated to the Patrol Division with the remaining officers dedicated to special assignments such as the Community Action Team (C.A.T.), School Resource Officers, along with Gang and Narcotics Enforcement. The Patrol Division for the Coachella Police Department covers an area of over thirty (30) square miles and serves a population of over 40,000 residents. The Coachella Police Department responds to over approximately 24,000 calls for service or approximately (79) calls for service daily.

Schools

There are two school districts providing public education to students in kindergarten through 12th grade in Coachella: Desert Sands Unified School District (DSUSD) and Coachella Valley Unified School District (CVUSD). The majority of the City, including the Project site, occurs within CVUSD's service area. CVUSD receives funding from state funds and local property taxes. The nearest schools to the Project site include Valley View Elementary (0.5 miles northwest), Bobby Duke Middle School (0.7 miles northwest) and Calle Del Sol Elementary School (0.65 miles northeast).

Parks

The City of Coachella currently operates ten parks and recreational facilities that support uses such as sports, community activities and playground. The City's Municipal Code Section 16.36.060 provides for the dedication of land or the payment of fees in lieu thereof for park and recreational facilities as a condition of approval of a tentative map or parcel map. All residential developments subdivisions containing five or more parcels are required to dedicate land, pay a fee, or both. However, commercial and industrial uses are exempt from such payment per Section 16.36.060.E.

Discussion of Impacts

Fire Protection: Less than Significant.

The common national standard for fire service is one firefighter staff person per 1,000 City residents. According to the GP DEIR, Coachella has a ratio of 0.4 firefighter people per 1,000 residents. It is the goal of the RCFD fire service to have the first engine company arrive on the scene within five minutes 90 percent of the time. Response time to emergency calls within the City average approximately four minutes or less more than 80 percent of the time. (GP DEIR, p. 4.15-4). Therefore, the City is currently under serving

its residents. Because the City does not meet current demands, the GP EIR determined growth in population could result in an ever more decreased level of service and a higher demand for increased fire stations throughout the General Plan Planning Area.

The Project proposes the expansion of the existing Armtec facilities and is protected by fire services. The Project will result in an increased number of structures on site, but does not propose the hiring of additional employees. Therefore, the Project would not induce population growth which would increase the demand for fire protection services. The Project occurs 1 mile from the Fire Station 79, where the Fire Department provides existing service. The Project will not require the construction of new facilities or expansion of existing facilities to receive adequate services.

Project development will be in accordance with all state and local (Municipal Code and RCFD) fire standards to assure adequate fire safety and emergency access. The Project will be required to pay any necessary City development impact fees (Municipal Code Chapter 4.45) to contribute its fair share of costs for future fire facilities, personnel, and apparatus. Impacts would be less than significant. Therefore, impact will be less than significant.

Police Protection: Less than Significant

The site is currently occupied with the existing Armtec facilities and protected by police services. While the Project would marginally increase the number of structures, it does not propose the hiring of additional employees and therefore would not induce population growth that would increase the local demand for police services. The Project occurs 1.5 miles from the Riverside County Thermal Station, where the Police Department provides existing service. The Project will not require the construction of new facilities or expansion of existing facilities to receive adequate services.

The Project will be required to comply with all Police Department regulations and procedures, and Project plans will be reviewed by the Police Department to assure adequate emergency access is provided. The Project is not expected to require the construction of new or expanded police services or facilities. Impacts will be less than significant.

Schools: Less than Significant

The Project is within the CVUSD boundaries. The Project consists of industrial development and will not directly increase the student population. Nevertheless, the proposed Project will be subject to the CVUSD developer fees in place at the time development occurs, which currently stands at \$0.78 per square foot of industrial development. Payment of the developer fee would mitigate potential significant impacts to school resources to less than significant levels.

Parks/ Other public facilities: Less than Significant

The Project does not include residential uses, and would not increase employment, that would increase the need for parks and recreational facilities. As such, the Project would not create the need for new parks and recreational facilities. Therefore, no impacts related to parks and recreational facilities would occur as a result of the Project.

Mitigation Measures: None required.

Monitoring: None required.

Source: City of Coachella General Plan Update EIR, October 2014; City of Coachella Website.

XVI. RECREATION Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?				X
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?				X

Setting

The City of Coachella provides a variety of recreation facilities and currently has eight parks that host various sports fields, a boxing club and swimming pools, as well as a tot lot and a community center, which total approximately 59.6 acres. The nearest recreational resource to the Project site is the Avenue 53 soccer fields located immediately west of the site.

The Desert Recreation District (DRD) also provides recreational services throughout the Coachella Valley. DRD manages, maintains and assists in maintaining over 30 parks and recreation facilities in the valley. DRD also offers a variety of quality programs, services and classes on physical fitness, mental wellness and arts and crafts.

Discussion of Impacts

a, b) Less than Significant Impact. The Project proposes the expansion of the existing Armtex facility. The proposed Project will be staffed by existing Armtex employees and city residents, and does not propose hiring additional employees. The Project does not propose residential uses, which would directly increase the city's population and demand for recreational resources. The proposed Project does not require the construction or expansion of recreational facilities, nor will it result in a noticeable increase of use, if any. Therefore, the Project will have no impact on recreation facilities

Mitigation Measures: None.

Monitoring: None.

Source: Website: City of Coachella Parks and Recreation. <https://www.coachella.org/residents/parks-and-recreation>. Accessed August 2024.

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

Setting

In the City of Coachella, roadways are classified into different roadway types. Tyler Street, which will provide primary access to the proposed site, is classified as Primary Arterial with Bicycle Facility adjacent to the site. Avenue 53, which runs along the site's northern boundary, is classified as a Collector with Bicycle Facility adjacent to the site.

Urban Crossroads prepared a traffic impact analysis for the proposed Project in 2024 (Appendix H). The Traffic Analysis was prepared in accordance with the County of Riverside's Transportation Analysis Guidelines for Level of Service & Vehicle Miles Traveled (December 2020) as the City of Coachella does not have its own LOS/VMT analysis guidelines. The City's acceptable Level of Service (LOS) for both roadway segments and intersection operations in LOS D or better. All area roadways and intersections currently operate at acceptable levels.

The Project trip generation rates are based on Institute of Transportation Engineers, Trip Generation Manual, 11th Edition, 2021. The following land uses were used to describe the Project: warehousing (ITE Land Use Code 150), manufacturing (ITE Land Use Code 140), and research and development center (ITE Land Use Code 760).

CEQA Guidelines section 15064.3 sets forth guidelines for implementing SB 743 (stats. 2013, ch.386), which requires amendments to the CEQA Guidelines (pre-2019) to provide an alternative to LOS for evaluating transportation impacts. Changes to CEQA

Guidelines were adopted in December 2018, which require all lead agencies to adopt vehicle miles traveled (VMT) as a replacement for automobile delay-based LOS as the new measure for identifying transportation impacts for land use projects. This statewide mandate went into effect July 1, 2020. The City of Coachella has not adopted its own VMT policy yet; land use projects are analyzed using the County of Riverside's Transportation Analysis Guidelines for Level of Service & Vehicle Miles Traveled (December 2020).

Discussion of Impacts

a) Less than Significant with Mitigation. The Project proposes 37,800 SF in new storage space, 3,000 SF in new research and development/small production space, 15,000 SF in new production facilities, and a truck staging area. The Project also includes the following adjacent improvements:

- Expansion of vehicle lanes on the east side of Tyler Street between the Armtec north boundary and south boundary within the City's right-of-way.
- Installation of concrete curbing on the east side of Tyler Street between the Armtec north boundary and south boundary within the City's right-of-way.
- Installation of a 5-foot sidewalk on the east side of Tyler Street between the Armtec north boundary and south boundary within the City's right-of-way.
- Installation of a 5-foot sidewalk along a separate parcel owned by Armtec (APN: 778-420-014) that is west of the northern parcel, currently not a part of the Armtec campus and is leased to the City for its use as a soccer park. The sidewalk is to complete the missing link between Shady Lane and Tyler Street.

The Project is anticipated to generate a total of 169 trip-ends per day with 21 AM peak hour trips and 20 PM peak hour trips.

The traffic impact analysis considered 5 area intersections, and the potential impacts the Project could have on those intersections:

- Grapefruit Boulevard (Highway 111) / Tyler Street
- Tyler Street / Avenue 53
- Tyler Street / Armtec Entrance
- Grapefruit Boulevard (Highway 111) / Palm Street
- Palm Street / Airport Boulevard

The following scenarios were analyzed:

- Existing (2024) Conditions
- Existing plus Ambient Growth plus Project (EAP) (2026)
- Existing plus Ambient Growth plus Project Plus Cumulative (EAPC) (2026)

Existing (2024) Conditions

The analysis of Existing Conditions establishes the baseline for the Project's traffic analysis, and consideration of impacts. Under Existing Conditions, study area intersections operate at an acceptable LOS ("D" or better) during AM and PM peak hours.

Table 18 Intersection Analysis for Existing (2024) Conditions					
Study Intersection	Traffic Control¹	AM Peak Hour		PM Peak Hour	
		Average Delay²	LOS³	Average Delay²	LOS³
Grapefruit Bl. (Hwy. 111) / Tyler Street	AWS	15.7	C	27.9	D
Tyler Street / Avenue 53	CSS	11.9	B	13.7	B
Tyler Street / Armtec Entrance	CSS	10.5	B	11.4	B
Grapefruit Bl. (Hwy. 111) / Palm Street	TS	7.1	A	9.1	A
Palm Street / Airport Bl.	TS	11.8	B	12.4	B

¹ TS = Traffic Signal; CSS = Cross-street Stop., AWS = All-way-stop.
² Per the Highway Capacity Manual (7th 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. Delay and level of service is calculated using Synchro 12 analysis software.
³ LOS = Level of Service
BOLD = Unacceptable LOS.

The unsignalized study area intersection of Tyler Street at Grapefruit Boulevard / Highway 111 meets traffic volume warrants for installation of a traffic signal based upon existing traffic counts.

Existing Plus Ambient Plus Project (EAP) (2026) Conditions

For EAP (2026) traffic conditions, study area intersections continue to operate at an acceptable LOS during peak hours. For EAP conditions, no additional study area intersections meet the volume warrants for installation of a traffic signal (beyond the Tyler Street at Grapefruit Boulevard / Highway 111 intersection, which meets volume warrants for a signal based upon existing counts).

Study Intersection	Traffic Control ¹	AM Peak Hour		PM Peak Hour	
		Average Delay ²	LOS ³	Average Delay ²	LOS ³
Grapefruit Bl. (Hwy. 111) / Tyler Street	AWS	17.1	C	34.0	D
Tyler Street / Avenue 53	CSS	12.3	B	14.5	B
Tyler Street / Armtec Entrance	CSS	10.7	B	11.7	B
Grapefruit Bl. (Hwy. 111) / Palm Street	TS	7.4	A	9.4	A
Palm Street / Airport Bl.	TS	12.0	B	12.6	B

¹ TS = Traffic Signal; CSS = Cross-street Stop., AWS = All-way-stop.
² Per the Highway Capacity Manual (7th 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. Delay and level of service is calculated using Synchro 12 analysis software.
³ LOS = Level of Service

For the proposed adjacent improvements, the traffic analysis recommends the existing striping and signage for stop sign control on the west leg of the Armtec main entrance should be upgraded. Mitigation Measure TRA -1 incorporates this recommendation.

Existing Plus Ambient Plus Project Plus Cumulative (EAPC) (2026) Conditions

For EAPC (2026) traffic conditions, the study area intersection of Tyler Street at Grapefruit Boulevard / Highway 111 was found to operate at an unacceptable LOS (i.e., LOS “E” or worse) during peak hours, without installation of the traffic signal that is currently warranted for existing conditions. The traffic analysis recommended improvements to address deficiencies: The Project should contribute its fair share of 10.5 percent towards the provision of a traffic signal control at the intersection of Tyler Street at Grapefruit Boulevard / Highway 111. With the recommended improvements, the intersection of Tyler Street at Grapefruit Boulevard / Highway 111 will operate at acceptable LOS. Impacts will be less than significant with Mitigation Measure TRA -2 incorporated.

Table 20 Intersection Analysis for EAPC (2026) Conditions					
Study Intersection	Traffic Control¹	AM Peak Hour		PM Peak Hour	
		Average Delay²	LOS³	Average Delay²	LOS³
Grapefruit Bl. (Hwy. 111) / Tyler Street -Without Improvements	AWS	23.9	C	39.9	E
-With Improvements	TS	10.3	B	9.2	A
Tyler Street / Avenue 53	CSS	12.5	B	14.7	B
Tyler Street / Armtec Entrance	CSS	10.8	B	11.8	B
Grapefruit Bl. (Hwy. 111) / Palm Street	TS	8.6	A	11.0	B
Palm Street / Airport Bl.	TS	13.0	B	13.2	B
¹ TS = Traffic Signal; CSS = Cross-street Stop., AWS = All-way-stop. ² Per the Highway Capacity Manual (7th 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. Delay and level of service is calculated using Synchro 12 analysis software. ³ LOS = Level of Service BOLD = Unacceptable LOS.					

Alternative Transportation

Sidewalks exist along the west side of Tyler Street from Grapefruit Boulevard to Armtec Entrance, the southwest side of Grapefruit Boulevard north of Tyler Street, and on Airport Boulevard from west of Palm Street to east of Grapefruit Boulevard. A bike lane is currently existing along the west side of Tyler Street from Grapefruit Boulevard to Avenue 53, the southwest side of Grapefruit Boulevard north of Tyler Street, and both sides on Avenue 53 east of Tyler Street. Project improvements include the installation of a 5-foot sidewalk on the east side of Tyler Street between the Armtec north boundary and south boundary within the City’s right-of-way, and the installation of a 5-foot sidewalk along a separate parcel owned by Armtec (APN: 778-420- 014) that is west of the northern parcel. The Project would not conflict with plans or policies addressing multimodal facilities.

The Project area is currently served by the Sunline Transit Agency with bus services along Avenue 54, Airport Boulevard, and Cesar Chavez Street. However, there are no transit stops within the immediate Project vicinity. The nearest bus stop is approximately 0.35 miles southeast. SunLine periodically reviews and updates its services and facilities based on ridership, budget, and community demand. General Plan Mobility Element Goal 8 and Policies 8.1 through 8.4 promote and encourage transportation system that provides an appropriate level of regional connectivity for residents and businesses through vehicular, freight, transit and non-motorized connections. The Project would have no impact on plans or policies addressing transit facilities.

b) Less than Significant Impact. CEQA Guidelines section 15064.3 sets forth guidelines for implementing Senate Bill 743 (SB 743). SB 743 requires amendments to the CEQA Guidelines (pre-2019) to provide an alternative to LOS for evaluating transportation impacts. Particularly within areas served by transit, those alternative criteria must “promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses.” (Public Resources Code Section 21099(b)(1).) Measurements of transportation impacts may include “vehicle miles traveled, vehicle miles traveled per capita, automobile trip generation rates, or automobile trips generated.”

The CEQA Guidelines have since been updated to allow for lead agency discretion in establishing methodologies and thresholds consistent with the intent of the legislation. The City utilizes the December 2020 County of Riverside Transportation Guidelines for VMT assessments. Per County guidelines, a project would have a less than significant VMT impact if:

- Small projects;
- Projects near high quality transit;
- Local serving retail;
- Affordable housing;
- Local essential service (day care, police or fire facility, medical/dental office, government office);
- Residential and office projects in an area under VMT thresholds as shown on screening maps (Low VMT Area); and
- Redevelopment projects.

County Guidelines define small projects as those forecasted to generate greenhouse gas (GHG) emissions below 3,000 Metric Tons of Carbon Dioxide Equivalent (MTCO_{2e}) per year and provides a list of land use types based on quantity (i.e., dwelling units or square footage) and provides a typical development potential to be below the 3,000 MTCO_{2e} per year. Warehouse buildings sized 208,000 square feet, industrial buildings sized 179,000 square feet and below and office buildings sized 165,000 square feet and below have been identified to meet the County threshold for small projects. The Project warehouse quantity of 37,800 SF is approximately 18 percent of the 208,000 SF warehouse VMT screening criteria. The Project manufacturing quantity of 15,000 SF is approximately 8 percent of the 179,000 SF industrial VMT screening criteria. The Project research and development quantity of 3,000 SF is approximately 2 percent of the 165,000 SF office VMT screening criteria. Therefore, the Traffic Analysis concluded that the Project meets the definition of a “small project,” and a full VMT analysis was unwarranted. Because the Project meets the County's screening criteria for small projects, impacts are presumed to be less than significant.

- c) **Less than Significant Impact.** The subject property is located within a largely developed urban area and accessed via existing highways, streets, and intersections. Project development will not require new access driveways but does propose adjacent street improvements and is required to pay a fair share contribution for the traffic signal improvements of Tyler Street at Grapefruit Boulevard (Highway 111) to correct an operational deficiency for EAPC (2026) conditions. However, all proposed and future improvements will be planned, reviewed by, and coordinated with the City such that safety and operational conflicts are effectively reduced. The mix of vehicles associated with the Project is expected to generally include construction vehicles, passenger vehicles, and distribution/delivery trucks, which is compatible with vehicles currently in the area; no conflicts are anticipated. The proposed Project is not expected to substantially increase any type of transportation hazard and impacts are expected to be less than significant.
- d) **No Impact.** Currently, the Project site can be accessed via Tyler Street via two driveways: the Armttec primary entrance and a gated access south of the primary entrance. Regional access to the site will be provided via Grapefruit Boulevard (Highway 111), I-10 freeway, major arterials, secondary arterials and a variety of local roads.

Prior to construction, both the Fire Department and Police Department will review the site plan to ensure safety measures are addressed, including emergency access. Therefore, the proposed Project will not result in inadequate emergency access. There will be no impact.

Mitigation Measures:

- TRA-1** For the proposed project-adjacent improvements, the existing striping and signage for stop sign control on the west leg of the Armttec main entrance shall be upgraded as recommended in Appendix H (Project Traffic Report).
- TRA-2** To remedy the LOS deficiency at the intersection of Tyler Street at Grapefruit Boulevard / Highway 111, the Project is responsible for a fair-share contribution of 10.5% towards the provision of a traffic signal.

Monitoring:

- TRA.A** The Project applicant shall coordinate with the City and CVAG the payment of the agreed upon fair share contribution for improvements to the intersection of Tyler Street at Grapefruit Boulevard / Highway 111 prior to the issuance of the first certificate of occupancy for the Project.

Responsible Parties: Project applicant, Engineering Department.

Source: Armttec Master Plan Traffic Analysis, prepared by Urban Crossroads. July 3, 2024, Coachella 2035 General Plan, Mobility Element.

XVIII. TRIBAL CULTURAL RESOURCES				
a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or		X		
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.		X		

Setting

Cahuilla Indians inhabited the valley for centuries. They were a Takic-speaking people of hunters and gatherers generally divided into three groups based on their geographic setting: the Pass Cahuilla of the San Gorgonio Pass – Palm Springs area; the Mountain Cahuilla of the San Jacinto and Santa Rosa Mountains and the Cahuilla Valley; and the Desert Cahuilla of the eastern Coachella Valley. Today, Native Americans of Pass or Desert Cahuilla heritage are mostly affiliated with the Indian reservations around the Coachella Valley, including the Cabazon, Augustine, Torres Martinez, Twenty-nine Palms, Agua Caliente, and Morongo.

Discussion of Impacts

ai,ii) Less than Significant with Mitigation. Senate Bill 18 and Assembly Bill 52 (AB 52) requires a lead agency to consult with tribes in the Project area during the CEQA process to allow tribes to be involved in the project development process and to address their concerns about potential impacts to tribal cultural resources. The consultation process requires the lead agency to provide written notification about a proposed project, as defined by CEQA, to tribes within the project's geographic area. If a tribe chooses to engage in consultation, it must respond to the lead agency within 30 days of receipt of the formal notification, and the lead agency must begin the consultation process within 30 days of receiving the request for consultation. Consultation concludes when the parties agree to measures to mitigate or avoid a significant effect (if a significant effect exists) on the tribal cultural resources, or when a party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached (Public Resources Code section 21080.3.2 (b)(1) and (2)).

The City conducted Tribal Consultation in conformance with AB 52 requirements. Five (5) Tribes were contacted in writing (Torres Martinez, Soboba, Cabazon, Twenty-Nine Palms, and ACBCI) in a letter dated February 6, 2025. As of April 17, 2025, only one Tribe, ACBCI, responded. The following requests are from the ACBCI's AB 52 response letter dated February 19, 2025 (TCR-1):

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

The City met with the ACBCI THPO on March 5, 2025 for government-to-government consultation to discuss the Project and Phase 1 Archeological and Paleontological Resources Assessment. Several revisions to the Assessment's

mitigation measures were requested during consultation, primarily involving clarifying language regarding Native American Monitoring agreements and the inclusion of a Tribal resource reburial process. Revisions were made to the Assessment and is reflected in the mitigation measures provided in Section V. Cultural. The City received a letter dated April 16, 2025 from the ACBCI THPO confirming that the concerns of the Tribe have been addressed in the revised Assessment. The letter also confirmed the conclusion of the Tribe's AB 52 consultation efforts.

Should responses from the remaining Tribes be received, the City may include additional requests for consultation or mitigation as conditions of approval. In addition, to protect potential tribal cultural resources, Mitigation Measure CUL-1 through -8 are included in Section V, consistent with the findings of the Phase 1 Archeological and Paleontological Resources Assessment, to require monitoring of ground disturbing activities, which would reduce the impacts to Tribal Resources to less than significant levels.

Mitigation Measures: See Section V. Cultural

TCR-1 The following requests are from the ACBCI's AB 52 response letter dated February 19, 2025:

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

Monitoring: See Section V. Cultural

TCR-A The executed monitoring agreements shall be provided to the City prior to the issuance of grading permits. Should buried cultural deposits be encountered, the Monitor may request that destructive construction halt

and the Monitor shall notify a Qualified Archaeologist (Secretary of the Interior's Standards and Guidelines) to investigate and, if necessary, prepare a mitigation plan for submission to the State Historic Preservation Officer and the Agua Caliente Tribal Historic Preservation Office.

Responsible parties: Project applicant, Project archaeologist, Tribal monitor, Planning Division.

Source: Phase 1 Archaeological and Paleontological Resources Assessment for the Armtec Defense Products Co. Master Plan Project, prepared by ArchaeoPaleo Resource Management, Inc. August 2024.

XIX. UTILITIES AND SERVICE SYSTEMS Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?			X	
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?			X	
c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?			X	
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?			X	
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?			X	

Setting

Domestic Water

The Coachella Water Authority (CWA) provides domestic water to the project area. CWA participated in the 2020 Coachella Valley Regional Urban Water Management Plan (RUWMP) to ensure a sufficient and reliable water supply for development projects within the. CWA's primary source of fresh water is groundwater extracted from deep wells in the Indio Subbasin of the Coachella Valley Groundwater Basin. The City lies

within the Whitewater River Watershed, which also supplies water to neighboring Coachella Valley cities. The Coachella Valley Groundwater Basin includes natural supplies; additional water sources include recycled water and imported supplies that are recharged to the Basin.

The City of Coachella currently uses approximately three to five percent of the total volume of water withdrawn from the Coachella Valley Groundwater Basin each year. The City supplies 100 percent of its potable water from City owned and operated wells. There are currently six operational wells within the City's distribution system. The total pumping capacity of active wells is approximately 11,400 gallons per minute (gpm) or 16.5 million gallons per day (MGD). CWA has three water storage reservoirs within the City, with a total reservoir storage capacity of approximately 10.5 million gallons (MG). In addition, CWA operates two booster pumping stations. CWA's distribution system network consists of approximately 120 miles of pipeline, which range from 4-inches to 36-inches in diameter (2015 Urban Water Management Plan).

The City currently does not have infrastructure in place to recycle water. However, it is in the process of updating its sewer master plan, which will include a feasibility study for implementing a recycled water program. If the treatment system upgrade feasibility study produces a favorable result, recycled water could be for various purposes, including non-potable irrigation systems for larger developments. Currently, the City is participating in a Coachella Valley wide recycled water feasibility study spearheaded by the CVRWMG as part of the Coachella Valley IRWM Plan.

Colorado River water is transported to the Coachella Valley via the Coachella Canal and used by the agricultural community for farming purposes; however, it is not a part of the CWA system. Per CVWD Ordinance No. 1428, CWA has the opportunity to receive canal water for additional potable water supply when available. The City continues to look at the use of Canal water for both domestic water and irrigation.

Wastewater

The City's wastewater conveyance and treatment services are operated by the Coachella Sanitary District (CSD) which was established in 1936 and maintains approximately 90 miles of wastewater conveyance pipeline, two pump stations, and a wastewater treatment plant. The diameter of the wastewater conveyance pipelines range from 4 to 54 inches. The two pump stations are: Coachella Valley High School Pump Station (CVHS PS) and Polk Street Pump Station (City of Coachella 2015 Sewer System Master Plan; Figure 2-1). The City's wastewater treatment plant is located at Avenue 54 and Polk Street and its capacity is 4.5 million gallon per day (MGD). The City also receives wastewater conveyance and treatment services through the Valley Sanitary District (VSD) for flows generated within the incorporated boundary; however, CSD is the primary service provider.

The CSD currently serves 6,500 Equivalent Dwelling Units (EDUs) and approximately 3,500 customers via its wastewater conveyance network. These customers consist primarily of residential development with a light mix of commercial, industrial, and some agricultural customers.

Stormwater Drainage

The Project site and areas surrounding it are subject to City requirements relating to flood control. The City implements standard requirements for the retention of storm flows, and participates in the National Pollution Discharge Elimination System (NPDES) to protect surface waters from pollution. Development projects must retain the 100-year storm flow onsite.

Solid Waste Disposal

Burrtec provides solid waste disposal services to the City. Trash and recycled materials are collected from customers in the City and transported to the Coachella Valley Transfer Station located on Landfill Road east of Dillon Road and north of Interstate 10. The Coachella Valley Transfer Station currently receives an average of 328 tons of waste per day and has a capacity of 1,100 tons of waste per day. Once sorted, solid waste is transported to regional landfills, including Lamb Canyon and Badlands, which are operated by the County of Riverside.

Other Utilities

In Coachella, Imperial Irrigation District (IID) provides electricity, Southern California Gas (SoCalGas) provides natural gas, and Frontier and Spectrum provide telecommunications services.

Off-Site Improvements

The Tyler Street widening improvements include road expansion, new asphalt, curb, gutter, and a separated sidewalk between Avenue 53 and Tyler Lane. Tyler Street will be widened by 19 feet to the east from Avenue 53 to the southern Armttec property line, covering approximately 1,830 linear feet. There is existing CVWD infrastructure and easements within Tyler Street right-of-way. Easements include a North/South 10-foot USBR easement on the east side of Tyler Street and another East/West 10-foot easement within the old Avenue 53 right-of-way. CVWD has requested replacing 20 linear feet of irrigation line with modern PVC pipe and to relocate a CVWD meter stand to allow for a 5.5 foot wide sidewalk. Pending direction of CVWD, there is potential for the district to request replacement of 1,280 linear feet of existing irrigation line within the CVWD easement on the eastern side of the Tyler Street.

Discussion of Impacts

a-c) Less than Significant Impact.

Water

The Coachella Water Authority (CWA) will provide domestic water services to the project site. The proposed project will connect to existing domestic water lines on

site that connect to Tyler Street. No new wells or additional water infrastructure or entitlements will be required.

As explained in Section IX, Hydrology and Water Resources, water demand for the cultivation portion of the proposed development is estimated to be approximately 7.57 AF/year. Additional water will be required for landscape irrigation, but given the limited area to be landscaped and the required use of drought-tolerant plant species and water-efficient irrigation, landscaping is not expected to contribute substantially to project water demand.

CWA is responsible, under the California Water Code, for analyzing its current and future water supply, and assuring that sufficient supply is available to serve land uses within its service area, through the preparation of an Urban Water Management Plan (UWMP). CWA participated in the 2020 Coachella Valley Regional UWMP, which used the City's General Plan land uses as a basis for planning. CWA has demonstrated sufficient water supplies to serve the City through 2045 during normal, single dry, and multiple dry years.

Coachella's primary water source is local groundwater from the Lower Whitewater River Subbasin that is pumped by CWA's six operational wells. Currently, the total pumping capacity of the wells is an estimated 11,400 gallons per minute (gpm) or 16.5 million gallons per day (MGD). The basin has a capacity of approximately 28.8 million AF and currently contains 25 million AF. The proposed project's water demand will have a less than significant impact on groundwater resources. Sufficient water supplies are available to serve the proposed project from existing entitlements. No new or expanded entitlements or infrastructure is required. The applicant will be required to consult with the City's Utilities Manager and Environmental Programs Coordinator regarding water connections, and utility connection impact fees. Impacts will be less than significant.

Wastewater

The proposed project will result in increased wastewater flows, which will be transported to the Coachella Sanitary District Treatment Plant. All development will be required to connect to the existing sanitary sewer systems on-site. The Coachella Sanitary District (CSD), which operates wastewater treatment facilities in the City of Coachella, will serve the proposed project and is subject to wastewater treatment standards established by the Regional Water Quality Control Board. All components of the proposed project will be required to design facilities consistent with CSD and Regional Board standards. This will assure that impacts associated with wastewater treatment will be less than significant.

CSD conducts long-range planning for sewer services based on the General Plan land uses in its Sewer System Master Plan (SSMP, 2015). CSD has indicated sufficient capacities at the wastewater treatment plant and force mains,

although certain pipes and pump stations are identified for necessary upgrades to accommodate growth under the General Plan. The City and CSD are responsible for programming projects recommended in the SSMP, which are expected to be funded under a combination of development impact fees and rate increases. In addition, the applicant will be required to consult with the City's Utilities Manager and Environmental Programs Coordinator regarding sewer connections, and utility connection impact fees.

The Project will not require the construction of new wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects. The city sewer system has sufficient capacity to transport and dispose of the proposed project's wastewater. The current capacity for the treatment plant is 4.5 million gallons per day. The added wastewater flows associated with the proposed Project would result in a less than significant impact.

Stormwater

Storm water infrastructure within the City consists of a network of regional and local drainage channels. Ultimately, all major storm flows in the City are conveyed to the Coachella Valley Stormwater Channel, which discharges into the Salton Sea. The proposed Project will not discharge into either regional or local drainages. Rather, it will manage stormwater on-site at the existing retention basins located at the southwest corner of the Armtec property.

As required by the federal Clean Water Act (CWA) (33 U.S.C. § 1251 et seq.) and the California Water Code (CWC) (commencing with section 13000), a Preliminary Water Quality Management Plan will be prepared for the Project. As discussed above in Section X, Hydrology and Water Resources, the Project site will incorporate BMPs for construction and post-construction conditions, designed to control pollutants that enter the on-site and off-site system, and is not expected to affect water quality. A final hydrologic analysis will be required to demonstrate that the Project meets the City's standards. These standard requirements will assure that impacts associated with storm water retention remain less than significant.

Other Utilities

The proposed Project will connect to the existing electric power, natural gas, and telecommunications infrastructure located on-site. The Project would not result in the construction of new electric power, natural gas, or telecommunications facilities off-site that could cause significant environmental effects.

Regarding off-site improvements, pending direction of CVWD, there is potential for the district to request replacement of 1,280 linear feet of existing irrigation line within the CVWD easement on the eastern side of the Tyler Street.

d-e) Less than Significant Impact. Construction and operations-related solid waste from the Project will be collected and disposed by Burrtec, a regional commercial vendor that serves the City by hauling solid waste to transfer and recycling centers and landfills. Burrtec also collects and recycles construction waste. The Lamb Canyon regional landfill has a remaining capacity of 19,242,950 cubic yards as of 2015 (latest data available).¹²

The project will generate 144.61 tons of solid waste per year, or 72.31 tons per year after 50 percent diversion as shown below.

Table 21				
Estimated Solid Waste Disposal at the Project Buildout				
Land Use	CIWMB Disposal Rates	Proposed	Solid Waste Disposal (pounds per day)	Solid Waste Disposal (tons per year)
Manufacturing / Warehouse	1.42 lbs./ 100 SF/day	55,800 SF	792.36	144.61
TOTAL (with 50% diversion)				72.31

*Estimated Solid Waste Generation Rates by CalRecycle, <https://www2.calrecycle.ca.gov/WasteCharacterization/General/Rates>, Accessed August 2024

At buildout, the proposed Project will contribute less than 1 percent of the County's remaining capacity. Commingled recyclable materials (e.g., paper, plastic, glass, cardboard, aluminum) will be transported to Burrtec's material recovery facilities for recycling and reuse.

Burrtec is responsible for maintaining standards that assure that all waste is handled in a manner that meets local, state and federal standards. These requirements will assure that impacts associated with solid waste disposal remain less than significant.

Mitigation Measures: None.

Monitoring: None.

Source: 2020 Coachella Valley Regional Urban Water Management Plan; City of Coachella 2015 Sewer System Master Plan, June 2015.

¹² CalRecycle SWIS Facility/Site Activity Details. <https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/2246?siteID=2368>, accessed August 2024.

XX. WILDFIRE – If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?				X
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?				X
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?				X
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?				X

Setting

The California Department of Forestry and Fire Protection (CalFire) ranks fire hazards of wildland areas in the state using four main criteria: fuels, weather, assets at risk, and level of service. There are no state responsibility areas (SRA) or Very High Fire Hazard Severity Zones (VHFHSZ) in or near the City.

Discussion of Impacts

a-d) No Impact. The proposed Project will have no impact on wildfire. The City of Coachella consists of primarily local responsibility area (LRA) and some federal responsibility area (FRA). There are no SRA, VHFHSZ, or any other designated fire hazard zones in the City. There is no substantial vegetation within the City to generate a high wildfire risk, and the Project site is not near wildlands or forested lands.

The Project site is accessed by Tyler Street, Avenue 53, and Grapefruit Boulevard/Highway 111. The Project would not impair the City's adopted emergency response plan or evacuation plan as it does not propose to amend these or other evacuation routes or plans. Project construction plans will be reviewed by and coordinated with the City and Fire Department to assure that adequate emergency access is maintained during the construction process. The Project would not require the installation or maintenance of wildfire infrastructure that could exacerbate fire risks or result in adverse environmental impacts. The Project site is relatively flat on the central valley floor and would not expose people or structures to downslope flooding or landslides resulting from post-fire instability or drainage changes. No impact would occur.

Mitigation Measures: None

Monitoring: None

Source: Website: CalFire Fire Hazard Severity Zones. <https://osfm.fire.ca.gov/what-we-do/community-wildfire-preparedness-and-mitigation/fire-hazard-severity-zones>. Accessed August 2024.

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

a) Less than Significant Impact with Mitigation.

Biological Resources: The Project site is not located within a CVMSHCP-designated conservation area and does not contain any wildlife corridors or biological linkage areas. The site has been previously graded and does not contain vegetation that could provide suitable habitat for nesting birds. Potential impacts to burrowing owl require pre-construction surveys on the northern parcel during Phase 2 development, as required by Mitigation Measure BIO.1. The site is subject to payment of the Development Mitigation Fee to mitigate potential

impacts to covered species under the CVMSHCP. The proposed Project will not significantly reduce fish or wildlife habitat or otherwise adversely impact a fish or wildlife species.

Cultural Resources: No cultural resources are known to exist within or adjacent to the project site. There is potential for unknown resources to be uncovered. Mitigation measures provided in this document will ensure that impacts to cultural and/or tribal resources are less than significant in the unlikely event that resources are discovered during project development.

Overall, there will be no significant environmental impacts which cannot be mitigated. Project related impacts, including cumulative impacts, are considered less than significant.

- b) Less than Significant Impact.** A significant impact could occur if the proposed Project, in conjunction with related projects, would result in impacts that would be less than significant when viewed separately, but would be significant when viewed together. Here, however, the impacts of the proposed Project are individually limited and not cumulatively considerable. The proposed Project is consistent with the development envisioned for the site in the City's General Plan. All environmental impacts that could occur as a result of the proposed Project would be less than significant with the implementation of mitigation measures included herein, and when viewed in conjunction with other closely related past, present or reasonably foreseeable future projects, would not be significant.
- c) Less than Significant Impact.** The proposed Project will not have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly, with the implementation of the City's Municipal Code, other standard requirements and requirements of law, and the mitigation measures included in this document.

REFERENCES:

I. AESTHETICS

Source: City of Coachella Municipal Code; City of Coachella General Plan; GoogleEarth.

II. AGRICULTURE RESOURCES

Source: California Important Farmland Finder, California Department of Conservation. <https://maps.conservation.ca.gov/DLRP/CIFF/>. Accessed August 2024; Phase I Environmental Site Assessment, Armtec Defense Technologies, prepared by Northgate Environmental Management, Inc. August 2024.

III. AIR QUALITY

Source: SCAQMD CEQA Air Quality Handbook (1993); SCAQMD Rule 402; 2022 Air Quality Management Plan, SCAQMD; Coachella Valley PM10 State Implementation Plan (2003 CV PM10 SIP); Coachella Valley 2008 8-hour Ozone SIP; SCAQMD Localized Significance Thresholds Appendix C – Mass Rate LST Look-up Table; CalEEMod Version 2022.1.

IV. BIOLOGICAL RESOURCES

Source: Coachella General Plan Draft Environmental Impact Report, 2014; Coachella General Plan; City of Coachella General Plan; CVMSHCP; Phase 1 Archaeological and Paleontological Resources Assessment for the Armtec Defense Products Co. Master Plan Project, prepared by ArchaeoPaleo Resource Management, Inc. August 2024; Project materials.

V. CULTURAL RESOURCES

Source: Coachella General Plan; City of Coachella General Plan Update Final Environmental Impact Report (CGPU EIR, SCH No. 2009021007), October 2014; Phase 1 Archaeological and Paleontological Resources Assessment for the Armtec Defense Products Co. Master Plan Project, prepared by ArchaeoPaleo Resource Management, Inc. August 2024.

VI. ENERGY

Source: Southern California Edison, www.cacities.org/detail-pages/partner/edison, accessed August 2024; *Integrated Resource Plan | Imperial Irrigation District*. (2024). iid.com. <https://www.iid.com/power/renewable-energy/integrated-resource-plan>; EMFAC. (2025). Ca.gov. <https://arb.ca.gov/emfac/scenario-analysis/generate-template>.

VII. GEOLOGY AND SOILS

Source: Technical Background Report to the Safety Element of the General Plan for the City of Coachella, prepared by Earth Consultants International, Inc. September 2014; Website: Web Soil Survey. U.S. Department of Agriculture. Accessed August 2024. <https://websoilsurvey.sc.egov.usda.gov/App/WebSoilSurvey.aspx>;

VIII. GREENHOUSE GAS EMISSIONS

Source: City of Coachella Climate Action Plan, prepared by Raimi and Associates. Adopted April 22, 2015; CalEEMod Version 2022.1.

IX. HAZARDS AND HAZARDOUS MATERIALS

Source: Phase I Environmental Site Assessment, Armtec Defense Technologies, prepared by Northgate Environmental Management, Inc. August 5, 2024; Envirostor, California Department of Toxic Substance Controls; State Water Resources Control Board (SWRCB) GeoTracker website; Noise Impact Analysis, Armtec Master Plan, prepared by Urban Crossroads, July 26, 2024.

X. HYDROLOGY AND WATER QUALITY

Source: Preliminary Hydrology Report, Armtec Defense Technologies, prepared by The Altum Group, February 3, 2025.

XI. LAND USE AND PLANNING

Source: Riverside County Airport Land Use Compatibility Plan Policy Document – East County Airports Background data. Amended September 2006). Coachella 2035 General Plan, Land Use and Community Character Element.

XII. MINERAL RESOURCES

Source: City of Coachella General Plan Update, Environmental Impact Report, SCH #: 2009021007. July 2014.

XIII. NOISE

Source: Armtec Master Plan Noise Impact Analysis, prepare by Urban Crossroads, July 2024.

XIV. POPULATION AND HOUSING

Source: California Department of Finance 2024 data on City/County Population and Housing Estimates.

XV. PUBLIC SERVICES

Source: City of Coachella General Plan Update EIR, October 2014; City of Coachella Website.

XVI. RECREATION

Source: Website: City of Coachella Parks and Recreation.
<https://www.coachella.org/residents/parks-and-recreation>. Accessed August 2024.

XVII. TRANSPORTATION/TRAFFIC

Source: Armtec Master Plan Traffic Analysis, prepared by Urban Crossroads. July 3, 2024, Coachella 2035 General Plan, Mobility Element.

XVIII. TRIBAL CULTURAL RESOURCES

Source: Phase 1 Archaeological and Paleontological Resources Assessment for the Armtec Defense Products Co. Master Plan Project, prepared by ArchaeoPaleo Resource Management, Inc. August 2024.

XIX. UTILITIES AND SERVICE SYSTEMS

Source: 2020 Coachella Valley Regional Urban Water Management Plan; City of Coachella 2015 Sewer System Master Plan, June 2015.

XX WILDFIRE

Source: Website: CalFire Fire Hazard Severity Zones. <https://osfm.fire.ca.gov/what-we-do/community-wildfire-preparedness-and-mitigation/fire-hazard-severity-zones>. Accessed August 2024.