

This section of the Draft Environmental Impact Report (Draft EIR) evaluates the potential for the proposed Section 31 Specific Plan Project (“Specific Plan Project” or “Project”) to impact Palm Springs Unified School District (PSUSD) school services and facilities. Please see **Section 9.0** for a glossary of terms, definitions, and acronyms used in this Draft EIR.

A. ENVIRONMENTAL SETTING

1. Existing Conditions

The Project Site consists of the approximately 618-acre property bordered by Monterey Avenue to the east, Frank Sinatra Drive to the south, Bob Hope Drive to the west, and Gerald Ford Drive to the north. The Project Site is located within the attendance boundaries of the PSUSD, which covers the Cities of Cathedral City, Desert Hot Springs, Palm Desert, Palm Springs, Rancho Mirage, and Thousand Palms. The Desert Sands Unified School District also serves portions of the Coachella Valley, including areas to the south and east of the Project site. The PSUSD facilities include 17 elementary schools with grades K–5; 5 middle schools with grades 6–8; 4 high schools with grades 9–12; and 6 alternative schools, which include an adult school, a virtual school, a training school, and an alternative education center.¹

PSUSD had a total enrollment of 22,691 students in the 2018–2019 school year.² Of this total enrollment, approximately 45 percent of PSUSD students were enrolled in elementary schools (grades K–5), approximately 24 percent were enrolled in middle school (grades 6–8), approximately 31 percent were enrolled in high school (grades 9–12), and a negligible percent were enrolled in alternative schools.³

Specifically, the Project Site falls within the attendance boundaries of Rancho Mirage Elementary School, located at 42-985 Indian Trail (3.5 miles southwest of the Project Site); Nellie N. Coffman Middle School, located at 34-603 Plumley Road (3.1 miles northwest of the Project Site); and Rancho Mirage High School, located at 31-001 Rattler Road (3.6 miles northwest of the Project Site), as shown in **Figure 5.13-1: Public Services Within Proximity to Project Site.**⁴

1 Palm Springs Unified School District, “Schools,” April 2019, accessed at <http://www.pusd.us/>.

2 California Department of Education (CDE), Educational Demographics Unit, *DataQuest*, “Enrollment,” accessed April 2019, <https://dq.cde.ca.gov/dataquest/>.

3 California Department of Education (CDE), Educational Demographics Unit, *DataQuest*, “Enrollment,” accessed April 2019, <https://dq.cde.ca.gov/dataquest/>.

4 Delia A. Diaz, Facilities Planning Clerk, Palm Springs Unified School District, email correspondence, April 22, 2019.

According to the most recent data obtained from PSUSD, the current capacity for Rancho Mirage Elementary is 621 students, Nellie N. Coffman Middle is 1,296 students, and Rancho Mirage High is 2,295 students.⁵

During the 2018–2019 school year, Rancho Mirage Elementary had an enrollment of 437 students, Nellie N. Coffman Middle had an enrollment of 1,103 students, and Rancho Mirage High had an enrollment of 1,471 students. As shown in **Table 5.13.3-1: PSUSD School Capacities and Current Enrollment**, none of the schools that would serve the Project Site are currently operating over capacity when compared with current enrollment.

Table 5.13.3-1
PSUSD School Capacities and Current Enrollment

School Name	Location	Current Enrollment	Current Capacity
Elementary School			
Rancho Elementary	42-985 Indian Trail	437	621
Middle School			
Nellie N Coffman Middle	34603 Plumley Road	1,103	1,296
High School			
Rancho Mirage High	31001 Rattler Road	1,471	2,295

Source: Delia A. Diaz, Facilities Planning Clerk, Palm Springs Unified School District, email correspondence, April 22, 2019.

2. Regulatory Setting

State

California Department of Education

The California Department of Education (CDE) has traditionally been responsible for the funding of local public schools. To assist in providing facilities to serve students generated by new development projects, the legislature passed California State Assembly Bill (AB) 2926 in 1986, which allowed districts to collect impact fees from developers of new residential and commercial/industrial building space. The California Education Code provides that the governing board of any school district is authorized to levy a fee, charge, dedication, or other requirement against any construction within the boundaries of the district, for the purpose of funding the construction or reconstruction of school facilities.

⁵ Diaz, (April 22, 2019).

Senate Bill (SB) 50 was passed in California in 1998. This legislation established that school districts are allowed to collect impact fees from developers of new construction as a source of funding to offset associated impacts to school services. These development fees are derived based upon square footage of different land uses and are determined based on three levels of funding.

This Project will comply with SB 50 in order to offset associated impacts to school services by development within the Project Site.

Regional and Local

Rancho Mirage General Plan

The Public Services and Facilities Element of the City's General Plan includes policies related to school services and facilities.⁶ This Element identifies the basic need for the City to support and provide educational opportunities within the community. These services are to be accessible to any person of the public, regardless of age, in order to further their personal and professional horizons. The City's ability to provide school services is based upon effective land use, circulation, and safety design. Therefore, any additional development can affect the City's capability to provide these services.

Rancho Mirage Municipal Code

New construction within the City of Rancho Mirage is subject to Title 3 of the *Rancho Mirage Municipal Code*, which sets policy for the requirement of development fees on new construction as a measure to fund local schools.⁷

B. ENVIRONMENTAL IMPACTS

1. Thresholds of Significance

In order to assist in determining whether a project would have a significant effect on the environment, the City finds a project may be deemed to have significant impacts on public services, including schools, if it would:

Threshold 5.13.3-1 Result in substantial adverse physical impacts associated with the provisions of new or physically altered school facilities, need for new or physically altered school facilities, the construction of which could cause significant

6 City of Rancho Mirage General Plan, Chapter 9: Public Services and Facilities, (November 2017).

7 City of Rancho Mirage, "Municipal Code," <http://www.qcode.us/codes/ranchomirage/>.

environmental impacts, in order to maintain performance objectives for school services.

2. Methodology

Future student populations were determined using standard generation rates provided by PSUSD based on the proposed land uses associated with the Project. These generation rates allow forecasting of the number of students in elementary, middle, and high school that would be generated by the Project.

The generation rates for residential uses are shown below in **Table 5.13.3-2: Student Generation Rates for Residential Uses**.

**Table 5.13.3-2
Student Generation Rates for Residential Uses**

Grade Levels	PSUSD Generation Rates (Single-Family Detached Units)	PSUSD Generation Rates (Multifamily Attached Units)
K-5	0.1211	0.0617
6-8	0.0795	0.0349
9-12	0.1332	0.0526

Source: Palm Springs Unified School District Residential Development School Fee Justification Study (April 2018).

The generation rates for commercial retail/service and hotel uses are shown below in **Table 5.11.3-3: PSUSD Student Generation Rates for Non-Residential Uses**.

**Table 5.13.3-3
PSUSD Student Generation Rates for Non-Residential Uses**

Land Use	Elementary	Middle School	High School
Commercial Retail/Services (per 1,000 SF)	0.0402	0.0257	0.0442
Hotel (per 1,000 SF)	0.0203	0.0130	0.0223

Source: Palm Springs Unified School District Commercial/Industrial Development School Fee Justification Study (April 2018).

3. Project Design Features

The Project does not include any features specifically related to school services.

4. Project Impacts

Threshold 5.13.3-1: *Would the project result in substantial adverse physical impacts associated with the provisions of new or physically altered school facilities, need for new or physically altered school facilities, the construction of which could cause significant environmental impacts, in order to maintain performance objectives for school services?*

The Project would develop up to 1,932 residential dwelling units as well as commercial, mixed-use, open space, and resort uses. As discussed in **Section 3.0**, of these units, approximately 962 would be multifamily units and 970 would be single-family residences. The residential units are anticipated to generate additional students that would utilize PSUSD facilities. As shown below in **Table 5.13.3-4: Estimated Student Generation from the Project**, based upon student generation rates provided by PSUSD, the residential portions of the Project would generate approximately 178 students grades K–5, 112 students grades 6–8, and 181 students grades 9–12 for a total of 471 students. The Project would include a range of residential dwelling products, including estates, single-family detached homes, branded resort units, and multifamily attached dwelling units in a variety of configurations.

**Table 5.13.3-4
Estimated Student Generation from the Project**

Grade Levels	PSUSD Generation Rates (Single-Family Detached Units)	PSUSD Generation Rates (Multifamily Attached Units)	PSUSD Generation Rates (Retail and Services Uses)	PSUSD Generation Rates (Hotel/Motel Uses)	Proposed Students (Residential Uses)	Proposed Students (Non-Residential Uses)
K-5	0.1211	0.0617	0.0402	0.0203	178	12
6-8	0.0795	0.0349	0.0257	0.0130	112	8
9-12	0.1332	0.0526	0.0442	0.0223	181	13
Subtotal					471	33
Grand Total					504	

Note: 190,000 sq. ft. of Retail and Services Uses were assumed (including the 15,000 sq. ft. Beach Club); 175,000 sq. ft. of Hotel/Motel uses were assumed associated with the proposed Resort.

Source: Palm Springs Unified School District Residential Development School Fee Justification Study, (April 2018), Palm Springs Unified School District Commercial/Industrial Development School Fee Justification Study, (April 2018).

Additionally, the Project would generate new employment opportunities that may result in indirect population growth in the area, which, in turn, could also increase demand for housing. Future student

populations were determined using standard generation rates, as provided by PSUSD, based on the proposed land uses associated with the Project. As shown in **Table 5.13.3-4**, the non-residential portions of the Project would generate approximately 12 students grades K–5, 8 students grades 6–8, and 13 students grades 9–12 for a total of 33 students.

Across the proposed residential, commercial, and resort land uses, the Project would add up to 190 students to Rancho Mirage Elementary School for a projected enrollment of 627 students which would be 6 students above the operating capacity of 621 students; would add up to 120 students to Nellie N Coffman Middle School for a projected enrollment of 1,223 students which would be below the operating capacity of 1,296 students; and would add up to 194 students to Rancho Mirage High School for a projected enrollment of 1,665 students which is below the operating capacity of 2,295 students. While all three of these schools are currently operating below their capacities, two would continue to operate below capacity with the addition of the students generated by the Project, while one (Rancho Mirage Elementary) would slightly operate beyond its operating capacity.

As the exact size, mix, and location of buildings and uses within the Planning Areas will depend on future ownership decisions and market demands, the number of each type of residential dwelling product is not yet known. Therefore, the residential student generation projections herein represent a conservative analysis of potential student generation and assume the maximum permitted number of single-family detached products, the use with the highest potential to generate students, permitted across PAs 1, 2, and 3 to be built. As outlined in the Section 31 Specific Plan, PAs 1, 2, and 3 would allow a range of residential permitted uses, including apartments and condominiums, multifamily, and single-family attached/detached housing, meaning the actual number of single-family residences built could be lower. Further, the Project's inclusion of a luxury resort-complex, residents' beach club, and other amenities is anticipated to appeal to a demographic subset of the population at or near retirement, consistent with the median age in the City of 65.9,⁸ who are less likely to have school-age children, and are purchasers of secondary or vacation homes. This is consistent with housing trends in the City such as a 2019 vacancy rate of 38.7 percent, a high for the Coachella Valley and Riverside County.⁹ Thus, a substantial of the population occupying the residential dwelling units proposed by the Project would be characterized as transient and would not be utilizing existing school facilities serving the Project Site. Therefore, it is likely

8 United States Census Bureau, American FactFinder, 2013-2017 American Community Survey 5-Year Estimates, accessed April 2019, available at <https://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?src=CF>.

9 California Department of Finance, Demographic Research Unit, *E-5 Population and Housing Estimates for Cities, Counties, and the State, 2011-2019 with 2010 Census Benchmark*, "Table 2: E-5 City/County Population and Housing Estimates, 1/1/2019," (May 1, 2019), accessed May 2019, available at <http://www.dof.ca.gov/Forecasting/Demographics/Estimates/E-5/>.

that the actual number of students generated by the Project would be substantially lower than the conservative assumptions described above.

In regard to the Notice of Preparation (NOP) comment letter that was submitted by PSUSD (see **Appendix A** of this Draft EIR) for the Project, PSUSD indicated that its existing school facilities are inadequate to serve the Project. It should be noted that this letter was in response to an earlier development concept of the Project, which was much larger in size than currently proposed. Accordingly, this letter greatly overstated the actual number of students that would be generated by the currently proposed Project.

Lastly, individual project proponents will be required to pay applicable development fees to PSUSD to ensure that school facilities are not adversely impacted by providing funds for any additional facilities, if needed, as identified in Mitigation Measure **MM 5.13.3-1**. Accordingly, impacts would be less than significant with mitigation.

5. Cumulative Impacts

Related projects within the PSUSD, in accordance with build-out of City and County General Plans, could contribute to a potentially significant adverse cumulative impact on school facilities and services. Development projects within PSUSD are required to pay established school impact fees in accordance with SB 50 to minimize impacts to the school system. PSUSD considers payment of the school impact fees to be adequate mitigation to offset impacts to PSUSD's facilities and services. In addition, the PSUSD schools in the Project vicinity are generally operating well below capacity. Therefore, cumulative impacts would be less than significant.

C. MITIGATION MEASURES

The following Mitigation Measure would reduce impacts related to school services:

MM 5.13.3-1 Prior to the issuance of building permits, individual project proponents shall pay applicable development fees to PSUSD.

D. LEVEL OF SIGNIFICANCE AFTER MITIGATION

Mitigation Measure **MM 5.13.3-1** would reduce potential impacts associated with school facilities and services to be less than significant. Cumulative impacts would also result in less than significant impacts to school services.