CITY OF DESERT HOT SPRINGS

RIVERSIDE COUNTY, CALIFORNIA

FINAL
ENVIRONMENTAL IMPACT REPORT

(SCH#2000021006)

FOR THE

DESERT HOT SPRINGS
COMPREHENSIVE GENERAL PLAN

PREPARED FOR

CITY OF DESERT HOT SPRINGS
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DESERT HOT SPRINGS, CA. 92240

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August 25, 2000

FINAL EIR
RESPONSE TO COMMENTS
ON
DRAFT ENVIRONMENTAL IMPACT REPORT
FOR THE
CITY OF DESERT HOT SPRINGS
COMPREHENSIVE GENERAL PLAN

August 25, 2000

CITY OF DESERT HOT SPRINGS
RIVERSIDE COUNTY, CALIFORNIA
STATE CLEARINGHOUSE NO. 2000021006

AGENCY COMMENTS/RESPONSE TO COMMENTS

The Response to Comments on the Draft EIR for the Desert Hot Springs Comprehensive General Plan has been prepared in accordance with Section 15088, 15089 and 15132 of the California Environmental Quality Act (CEQA) Guidelines. The following agencies and interested parties have commented on the Draft EIR. Please note that Section I contains agency comments and subsequent responses. Section II contains the full text of commenting agency correspondence.

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SECTION I

RESPONSE TO COMMENTS

The following comments were received on the Draft EIR transmitted to various public agencies and interested parties. These comments concern aspects of the DEIR, including clarification of information, limits of Comprehensive General Plan applicability, and similar issues. The following responses have been prepared to address issues raised in the agency/interested party comments.

A. U.S. DEPARTMENT OF THE INTERIOR/FISH AND WILDLIFE SERVICE

A-1. Comment: The Desert Hot Springs General Plan contains a unique assemblage of plants and wildlife, including many endemic and rare species. This General Plan update provides the City an opportunity to conserve unique species and habitats that have co-evolved over thousands of years, by considering the environment as an infrastructure component, along with the more traditional planning elements, such as utilities, traffic, public health, and safety. Information available through the Coachella Valley Multi-species Plan (Multi-species Plan) and the existing Fringe-toed Lizard Habitat Conservation Plan (HCP) provide a wealth of information on the natural resource heritage of the northern Coachella Valley that enables the City to plan its future in a way that harmonizes with the conservation needs of local plants and animals.

Overlays of General Plan alternatives onto an aerial image of the Desert Hot Springs area would facilitate a more effective integration of human and biological perspectives. Without aerial imagery, it is difficult to discern how the proposed zoning relates to topographical features and areas of biological concern.

A-1. Response: As part of the analysis of biological resources occurring within the General Plan planning area, a wide variety of biological assessments, broad-based surveys, and the various species maps prepared by the Coachella Valley Mountains Conservancy (CVMC) were evaluated. Much of these data were based upon USGS quad sheets and/or coordinate system. It should also be noted that the City is a member of the Coachella Valley Association of Governments (CVAG) and is signatory to the Memorandum of Understanding (MOU) for the Coachella Valley Multiple Species Habitat Conservation Plan (MSHCP). As such, the work being done by the CVMC is being performed on behalf of Desert Hot Springs and the other CVAG members.

A.-2. Comment: <u>Coachella Valley Fringe-toed Lizard Habitat Conservation Plan</u> In evaluating whether the HCP is functioning as originally intended, it has become apparent that in light of more recent information, the HCP underestimated the importance of Mission and Morongo washes to the long-term maintenance of the Willow Hole/Edom Hill Reserve. The sand transport process along the Big Morongo and Mission Creeks entails natural flooding and stream braiding across the floodplain, which fluvially disturbs armored surfaces and exposes subsurface sediments to strong winds and aeolian transport to the Willow Hole/Edom Reserve (Reserve) (Lancaster *et. al.* 1993). Aerial photography from 1960 (Proctor 1968) and 1991 (FWS, file info.) clearly reveal substantial

blowsand transport from Mission Creek to the Willow Hole area. In addition, the sand transport corridor for the Willow Hole/Edom Hill Reserve has been recognized by the Scientific Advisory Committee for the Multi-species Plan as the area bounded by 20th Avenue, Varner Road, Mission Wash and the Western Reserve Boundary along Mountain View Drive. The current and proposed zoning of the sand transport corridor for light industrial, residential estates (2.5 du/ac), and low density residential (0-5 du/ac) is not compatible with maintaining sand transport processes to the Reserve. Industry would effectively block the wind and sand with large structures, and residential development would shield sand transport due to the residences, and associated windbreaks, landscaping, and fences.

Sand deprivation, resulting from development of the sand transport corridor, would lead to long-term erosion by the prevailing westerly winds to the extent that sandy substrates would be eliminated over time downwind of the terminus of Mission and Morongo Washes (between the San Andreas Fault and Interstate and Interstate 10). This effect would compromise the ability of the Willow Hole-Edom Hill Reserve to function over the long-term as suitable habitat for the fringe-toed lizard. Loss of blowsand within the Reserve and surrounding areas would cause a significant reduction in the distribution, numbers, and reproduction of the Coachella Valley fringe-toed lizard.

A-2. Response: Comment noted. At the time the land use maps for the City General Plan were developed, the existing flood plain and blowsand corridor were recognized as constraints to development. Recognized also were the relationships between these natural systems and the dunes and vegetation scarps located along the Banning Branch of the San Andreas Fault, including those located within Willow Hole. Based upon an assessment of the type of development that would be likely in the light industrial and very low density residential designations described in the comment, it was determined that this type of development could be conditioned to be responsive to the potential flooding and the blowsand constraints in the area.

As has been discussed at length in numerous meetings of the various MSHCP committees, opportunities for development must be provided in order to preclude arguments of "taking" private property. The MSHCP currently under development is expected to make provision for development in future conservation areas, including ecological process areas, to be considered on a case by case basis. It is expected that future development proposals in this area will be required to demonstrate that there will be no adverse impacts to these systems or the Willow Hole-Edom Hill Reserve.

A.-3. Comment: In Section III(F)(3) of the DEIR, mitigation measure (O) states that the City should conscientiously work to preserve blowsand habitat near, within and tributary to the Willow Hole-Edom Hill Reserve, and should support efforts to preserve essential sand sources for the Reserve. This measure implies that appropriate zoning and land uses would be adopted to maintain sand transport processes, even through the actual zoning proposed conflicts with this measure. The EIR should resolve this inconsistency. Consequently, we recommend a hydrological study be conducted to determine how much of the 100-year floodplain for Mission and Morongo Creeks is necessary to maintain the sand source for the Reserve. Unless this hydrological study indicates otherwise, the 100-year floodplain for Mission and Morongo Creeks should be zoned Open Space/Flood Ways (OS/FW) and remain undeveloped.

A-3. Response: As shown on Exhibit III-2 (Preferred Alternative Land Use Map) in the Draft EIR, substantial portions of the area in question are designated OS/FW (Floodways). This mapping is largely consistent with that on the currently applicable Riverside County Western Coachella Valley Community Plan map. This mapping goes well beyond that shown for the 100-Year flood ways delineated on the relevant FEMA Flood Insurance Rate Maps (FIRM), as shown on Exhibit III-13 of the Draft EIR. As a part of the multi-agency MSHCP planning and analysis process, it is understood that two separate hydrology studies are underway on the Mission and Morongo Creek drainages. As noted in Response A-2, above, the land use designations assigned to this area are meant to minimize the potential incompatibilities between development and the fluvial and aeolian sand transport systems. Development proposals in this area will be required to demonstrate that they can avoid or adequately mitigate significant impacts to the Coachella Valley fringe-toed lizard, its habitat and associated essential ecological processes.

A.-4. Comment: Multi-species Plan The General Plan area supports suitable habitat for the following rare species proposed for inclusion in the Multi-species Plan: federally endangered Coachella Valley milk-vetch (*Astragalus lentiginosus* var. *coachellae*), Little San Bernardino Mountains gilia (*Gilia maculata*), flat-tailed horned lizard (*Phrynosoma mcallii*), Palm Springs ground squirrel (*Spermophilus teriticaudus chlorus*), Palm Springs pocket mouse (*Perognathus longimembris bangsi*), LeConte's thrasher (*Toxostoma lecontei*), burrowing owl (*Speotyfo cunicularia*), and the Coachella giant sand treader cricket (*Macrobaenetes valgum*). The Multi-species Plan likely will propose conservation of the 100-year floodplain for Mission and Morongo washes and the sand transport corridor mentioned above. Various

Multi-species Plan alternatives also propose upper portions of Mission and Morongo Creeks as essential core habitat, as well as the sand transport corridor for the Reserve, between 20th Avenue and Varner Road, as an essential ecological process area. The proposed zoning in the DEIR for the 100-year floodplain and sand transport corridor as described above, would potentially preclude conservation coverage for some of these species in the Multi-species Plan because of significant, unmitigated effects. If developed according to the zoning proposed in the DEIR, the sand transport system for the Willow Hole-Edom Hill Reserve would be compromised, as well as species that inhabit the Reserve and sand transport corridor.

A.-4. Response: Comment noted. Please see Responses A-2 and A-3, above. It is currently unknown whether and to what degree avoidance of channelization and preservation of the 100-Year flood plains associated with Mission and Morongo Creeks is essential to the maintenance of a viable sand source and transport system in the corridor up wind of the Willow Hole-Edom Hill Preserve. As mentioned above, two additional studies are currently underway to further assess these fluvial systems.

Substantial portions of these flood plains, particularly north of Dillon Road, already have residential, industrial and commercial development, including that associated with the City's western residential core and industrial park, and substantial residential, commercial and industrial development on County lands within the flood plain. As already noted, it is not clear what areas of the flood plain up-stream of the wind corridor are appropriate for preservation in an unimproved state in order to maintain an effective sediment transport system. To the extent that development within the flood plain must comply with various development standards, including elevated finished floor levels, these requirements are expected to continue to control and constrain development in these areas.

A.-5. Comment: CEQA The Palm Springs pocket mouse is a narrow endemic species that only occurs in the Coachella Valley on loosely packed or sandy soils. The vicinity of T2S, R4E, Section 21 that is designated as 100-year floodplain, supports a high abundance of Palm Springs pocket mouse (*Perognathus longimembris bangsi*) according to studies conducted for the Coachella Valley Multi-species Habitat Conservation Plan (Dodd 1999). Areas south of these sections, with similar sandy habitat (denoted as alluvial fan and active channel deposits on the geology map in the DEIR), likely support similar abundances of Palm Springs pocket mouse, given comparable habitat quality (Shana Dodd, pers. comm.).

A.-5. Response: Comment noted. The commentor is correct that the subject Section 21 is the site of known locations for the Palm Springs pocket mouse, which appear primarily in the NE1/4 of the subject section. This site has been cut out of the previously approved Rancho Royale Specific Plan and certified EIR. The subject quarter section has been purchased by the Desert Water Agency for the development of a groundwater recharge basin to recharge the Mission Creek Subbasin, which is in a state of overdraft. The species shows a fairly wide distribution, and maps for the Palm Springs pocket mouse show a very broad area of occupied or occupiable habitat.

A.-6. Comment: Little San Bernardino Mountains gilia is restricted to areas of the Little San Bernardino Mountains around Desert Hot Springs and at the northern edge of Joshua Tree National Park. Adjacent areas in an around Section 22 support a large population of Little San Bernardino Mountains gilia. The majority of known locations of Little San Bernardino Mountains gilia in the Coachella Valley are in and around the Mission and Morongo washes in the vicinity of Highway 62. The known locations within the Coachella Valley are on the margins of washes on shallow sandy benches, commonly found within the 100-year floodplain for Mission and Morongo Creeks. The draft Multi-species Plan describes the greatest threat to this species as "...growing urbanization in the vicinity of Desert Hot Springs and Highway 62 where the largest populations exist." The DEIR identified that the zoning in the General Plan (p. III-87) "...could constitute a significant impact to species with extremely limited distribution, such as the Coachella Valley milk-vetch, Little San Bernardino Mountains gilia, and California ditaxis." Clearly, the proposed zoning in the General Plan would significantly impact Little San Bernardino Mountains gilia, due to the virtual destruction of the largest known population in the Coachella Valley.

A.-6. Response: According to the species occurrence/habitat maps prepared by the CVMC, the known locations of the Little San Bernardino Mountains gilia in the Desert Hot Springs General Plan study area are primarily in Section 22 and the north portion of Section 25, T. 2 S., R. 4 E. As noted in the comment, both the Mission Creek and Morongo Wash pass through this section. These lands are predominantly designated R-L (0-5 du/ac) on the General Plan land use map and require the preparation of a Specific Plan before development can be approved. Depending on the outcome of environmental review, development in this section could be restricted due to the substantial flooding hazard, potential adverse impacts to biological resources or for other reasons.

Given the range of possible development densities, development could be restricted both in terms of intensity and/or location. Both the Specific Plan requirements and the likely need for substantial environmental review, will provide ample opportunity for the City and responsible and trustee agencies to review and affect any development that may occur on these lands.

A.-7. Comment: If the 100-year floodplain for Mission and Morongo Creeks is developed as proposed in the General Plan, not only would the Palm Springs pocket mouse and Little San Bernardino Mountains gilia populations be virtually eliminated, but the movement corridor for the pocket mouse from the upper portions of Mission and Morongo Creeks down to the Willow Hole area also would be eliminated. These species are considered Species of Special Concern by the California Department of Fish and Game. Developing some of the highest density habitat of Palm springs pocket mice and Little San Bernardino Mountains gilia known in the Valley, requires that the significant impacts be identified and mitigated to a level of insignificance. The DEIR lacked substantial discussion on the significant loss of Palm Springs pocket mice and Little San Bernardino Mountains gilia and associated mitigation measures.

A.-7. Response: Over the past decade, the City and the County Flood Control District have worked on plans to develop improvements to the Mission Creek and Morongo Wash drainages in order to protect substantial existing and anticipated future development in these flood plains. There is substantial disagreement on the need to provide a movement corridor for the Palm Springs pocket mouse through the existing 100-Year flood plain associated with these two drainages. As noted above, the distribution of the pocket mouse is relatively wide and the referenced movement corridor is not critical to the species' long-term survival. As noted above, there is ample opportunity to assure that impacts to the gilia are mitigated at the time development in habitat for the species is proposed.

While the General Plan does not prohibit development in these areas, neither does it guarantee that development that impacts the subject species will be determined appropriate, at any level. In the absence of financial resources to pre-emptively acquire potentially sensitive habitat, the General Plan, its EIR, CEQA and other regulations provide substantial development screening processes that have and should prove effective at precluding inappropriate impacts to these and other sensitive species that warrant protection. The City, as a signatory to the Coachella Valley MSHCP, is also expected to address the need for conservation areas that assure the long-term survival of these species.

A.-8. Comment: Section 15380 of the California Environmental Quality Act (CEQA) requires the lead agency to treat sensitive species as though they were listed, if the species meets the criteria for listing under State or Federal statues, or that described in Section 15380(b). The proposed zoning in the General Plan would significantly impact several rare species as discussed above. These species are proposed for conservation in the Multi-species Plan to avoid additional mitigation consequent to potential listing. CEQA requires that EIRs identify and focus on the significant environmental effects of proposed projects and analyze feasible measures to avoid or substantially reduce the project's significant environmental effect [Section 15126.4(a)]. The restricted distribution, declining trends, and assumed listed status in the Multi-species Plan, indicates that these species should be treated in the EIR as though they are listed, with appropriate avoidance, mitigation and compensation proposed for significant impacts.

A.-8. Response: Comment noted. Both the proposed General Plan and its EIR are responsive to the protection and conservation needs of sensitive plant and animal species occurring within the planning area. It should be kept in mind that the General Plan EIR is a programmatic document and, in conjunction with the policies and programs set forth in the General Plan, provides broader directives than do project-specific regulatory documents.

As discussed in the above responses, the General Plan EIR supports and directs the City to participate in the development and implementation of the Coachella Valley MSHCP. Where appropriate, the City shall also require that applicants secure Section 2081 incidental take permits from the California Department of Fish and Game before development can proceed. The EIR also directs the City to protect important habitat and wildlife corridors, preclude the use of invasive, non-native vegetation, and to support and participate in the development and implementation of the Coachella Valley MSHCP.

The Draft Comprehensive General Plan is also very responsive to the protection and conservation needs of plants and wildlife in the planning area. The Biological Element of the General Plan discusses the various habitats, the species of special concern, and sets forth a wide range of policies and programs designed to protect the City's valued wildlife. The General Plan explicitly directs the City to "participate and be a pro-active partner in the development and implementation of the Coachella Valley Multi-Species Habitat Conservation Plan..." (Program 2A, page IV-7). It also directs the City to "maintain a broad range of contacts,....and consult and cooperate in efforts to maintain and broaden habitat conservation, especially where essential for the preservation of sensitive, rare and endangered species." (Program 2B, page IV-7).

Other General Plan policies and programs which direct City conservation efforts include the following:

Program 2.C: Until adoption of the Coachella Valley Multi-Species Habitat Conservation Plan, the City shall continue to require the preparation of wildlife surveys and, as necessary, Habitat Conservation Plans, for new development in compliance with Federal Section 10a(1)(B) of the Endangered Species Act and Section 2081 of the State Endangered Species Act. (Page IV-7)

Again, it must be remembered that the Comprehensive General Plan and its EIR are programmatic documents, which rely on broadly applied mitigation measures and policies and programs to empower the City to regulate development and to protect sensitive biological resources. The application of these measures, policies and programs will assure the effective protection and conservation of all species of concern.

A.-9. Comment: The significant unmitigated effects of the General Plan update indicate that substantially greater consideration of biological consequences needs to be incorporated into the General PLan and CEQA planning processes. We, therefore, recommend the City defer consideration of the General Plan update until the Multi-species Plan is approved, to ensure that the planning processes compliment each other.

A.-9. Response: Comment noted. The Coachella Valley MSHCP has been evolving over many years and it is not yet known when or in what form the plan will be completed, adopted and implemented. In the interim, the proposed General Plan policies and programs, and the measures set forth in the program EIR substantially improve the City's regulatory authority over lands under its jurisdiction. Land use designations in areas of concern to the Service are substantially the same as those under the City's current General Plan or that of the County. Delay in or failure to adopt the General Plan and certify the EIR at this time will only serve to perpetuate the weak regulatory authority currently provided by the existing City General Plan.

B. STATE OF CALIFORNIA DEPT. OF CONSERVATION

B.-1. Comment: On page II-8 of the document, under Geothermal Resources, the Desert Hot Springs Sub-basin is mentioned as the primary source for geothermal waters in the City and its sphere-of-influence. In addition, the Division has delineated a geothermal field within this sub-basin. Enclosed are two maps. The larger map outlines the geothermal field and its isothermal contours and the smaller map outlines the geothermal field as it relates to development. We recommend that you confer with Mr. Timothy S. Boardman in the DOGGR district office in El Centro for questions or technical assistance. He may be reached at 485 Broadway, Suite B, El Centro, CA 92243; or, phone (619) 353-9900.

B.-1. Response: Comment noted. The City appreciates the large scale maps provided by the commentor and these have been incorporated into the City's database. The exhibits provided by the commentor are the same as Exhibits III-14 in the Draft EIR and IV-1 in the Draft General Plan. The source of these maps is also the same, Vol. II: Appendices of Geothermal Energy and the California Energy Commission, prepared by the US Department of Energy, July 31, 1978.

B.-2. Comment: Important aggregate resource deposits exist in the Desert Hot Springs planning area. Specifically, part of Sector C (NW1/4 Section 24, T2S, R4E) occurs in the planning area. Sector C is an area designated by the State Mining and Geology Board (SMGB) as an area of regional significance for aggregate resources. Although these resources occur in a relatively small portion of the planning area, they should be acknowledged and described in the final EIR. Project impacts on the continued availability of these resources should be discussed and mitigated in the final EIR. These impacts analyzed should include both direct and indirect (i.e., adjacent incompatible land uses) effects of the project. In discussing project impacts, the final EIR should discuss the loss of the resource in terms of projected regional demand and supply for aggregate.

B.-2. Response: Comment noted. Large areas of the planning area are designated MRZ-3 (Mineral Resource Zone-3) by the California Department of Mines and Geology[1]. This designation is assigned to areas "containing aggregate deposits, the significance of which cannot be evaluated from available data." These areas include those characterized as hilly or mountainous areas underlain by sedimentary, metamorphic, or igneous rock types and lowland areas underlain by alluvial wash or fan materials.

1 "Mineral Land Classification: Aggregate Materials in the Palm Springs Production-Consumption Region, Special Report 159", prepared by the Division of Mines and geology, California Department of Conservation. 1988.

Also as noted, lands in the vicinity of the NW1/4 Section 24, T2S, R4E., are designated as MRZ-2 and is one of eight such areas mapped in the Palm Springs Production-Consumption Region. This area occurs at the mouth of the Little Morongo Wash and approximately one mile of the wash area upstream. The upper wash area has flood control improvement and a portion of the lower area occurs within the developed Mission Lakes Country Club development. Most of the balance of this area occurs within the boundaries of the approved Indian Hills Specific Plan project area and immediately abuts the western boundary of the partially developed community of Rancho del Oro. A small portion of this zone occurs in the N1/2 of the SW1/4 of the subject Section 24 and is designated under the current and proposed General Plans for low density residential development. Resources in MRZ-2 areas classified for PCC grade aggregate (Portland cement concrete-grade aggregate). The availability of these aggregate resources appears to be precluded by existing and planned development, which dates back to the early 1970s.

Within Section 36, T. 2 S., R. 3 E. are lands delineated as MRZ-1 & MRZ-2, which include the Super Creek Quarry (aka Painted Hills Decorative Rock Quarry) producing decorative rock for the landscape industry. The subject quarry and MRZ-2 zone are located on lands under the jurisdiction of the US Bureau of Land Management and the City's General Plan actions are not expected to have any impact on the resources or on-going mining operations. A small ribbon of the MRZ-1 zone extends south into Section 1, T3 S., R. 3 E. MRZ-1 is designated for areas where adequate information indicates that no significant mineral deposits are present, or where it is judged that little likelihood exists for their presence.

B.-3. Comment: The State Mining and Geology Board has designated other sectors (for aggregate resources) just outside and to the south of the planning area that could pose future land use conflicts with urban uses if the deposits were to be developed for aggregate resources. The final EIR should examine the proposed general plan in light of these potential impacts.

B.-3. Response: Proposed land use designations in the southern portion of the planning area are primarily light industrial, public/flood way and very low density residential. Highway-serving commercial designations have also been assigned to lands at the Indian Avenue/I-10 and Palm Drive/I-10 interchanges. US Interstate-10 also serves as a buffer between the aforementioned resource lands and the planning area. Anticipated future development in the southern portions of the planning area are not expected to be adversely impacted by possible future sand and gravel operations.

C. SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

C-1. Comment: Constructive Emissions: Table III-18 on page III-105 of the DEIR gives estimates of fugitive dust emissions expected to be generated from site disturbance, grading and building on the 22,485 acres of the city General Plan area. The table does not, however, give any estimates of the other equally important air pollutant emissions that will be generated by the use of different types of construction equipment and vehicles during construction. Construction equipment and vehicles generate emissions such as carbon monoxide (CO), nitrogen oxides (NO_X) and volatile organic compounds (VOC) during construction. Given the distribution of the proposed land uses in Tables I-1 and I-2 of the DEIR, it should be possible to estimate the other air pollutant emissions using the assumptions and methodologies provided in the 1993 SCAQMD CEQA Air Quality Handbook (Handbook). It is suggested that an attempt at quantification of these pollutants be made in the Final EIR. This will enable staff and the public to properly assess the magnitude of the other air pollutant emissions.

C-1. Response: Attempts to quantify daily, monthly or even yearly fugitive dust or construction emissions would not provide a meaningful or particularly predictive analysis. Inasmuch as these emissions are short-lived, as compared with other moving and stationary emissions, these emissions are limited and one time events. Buildout of the General Plan will occur over a very extended period of time, and all specific projects will occur at limited and staged intervals. While estimated areas of development are known, it does not provide an adequate basis from which to calculate construction related emissions. To clearly identify the magnitude of air pollutants generated by buildout construction it is necessary to know the scope of the project, including the area where construction will occur, the estimated time of construction, site and development-specific earthmoving needs, as well as the number and type of equipment used. As with moving emission tables in the Air Quality Handbook, emission rates per running hour for construction equipment are expected to improve in future years. However, there are no sanctioned standards or projections to estimate future emissions. Therefore, to provide a more meaningful assessment of air quality impacts from construction equipment emissions should be addressed and analyzed on a per-project basis using the prevailing standards of the day.

C-2. Comment: Emission Factors: According to the footnotes in Table III-25, and to some extent in Table III-26, the emission factors used in estimating

emissions from vehicle trips were taken from the Table A9-5 series in the Handbook. Please note that the emission factors used in the A9-5 series were derived from an older and obsolete version of the California Air Resources Board's (CARB) mobile source emission factors inventory, EMFAC7EP. The ARB has produced more recent and updated emission factors in EMFAC2000. Current emission factors have been demonstrated to be generally higher than those used in EMFAC7EP. The AQMD recommends that the lead agency use the current emission factors to recalculate the motor vehicle emissions to reflect the most accurate data currently available. The EMFAC2000 emission factors can be obtained form the ARB web page at www.arb.ca.gov.

C-2. Response: Comment noted. However, it was discovered in subsequent discussions with SCAQMD that EMFAC2000 emission factors have not yet been released. Neither was SCAQMD able to get the model to yield meaningful results. Subsequently, further instruction was given by the SCAQMD to recalculate motor vehicle emissions using EMFAC7G emission factors instead, as shown in the tables below.

Moving Exhaust Emission Projections at Buildout
Calendar Year 2005
(pounds/day)

Estimated Miles Traveled in One Day: 4,466,310*

SPEED	POLLUTANTS			PARTICULATES		
(mph)	CO	ROC	NO	TIRE WEAR	BRAKE WEAR	EXHAUST
30	27,902.11	1,380.32	2,957.82	98.59	98.59	0
35	24,747.10	1,281.72	3,056.42	98.59	98.59	0
40	22,775.22	1,084.53	3,552.20	98.59	98.59	0
45	21,986.47	985.94	3,943.76	98.59	98.59	0
50	**23,071.01**	**887.35**	**4,732.51**	**98.59**	**98.59**	**0**
55	27,704.93	887.35	5,718.45	98.59	98.59	0
60	40,324.96	1,281.72	7,008.18	98.59	98.59	0

Calculations based upon 1,488,770 vehicle trips/day and average trip length of 3.0 miles, for total of approximately 4,466,310 miles traveled in one day. Assumes Year 2005 conditions for catalytic light duty autos at 75°F. Source: EMFAC7G Emissions Model, California Air Resources Board.

Due to the methodology used, cold and hot starts are not used in calculating moving emissions. Instead, associated emissions are integrated into the factors for running emissions as set forth in the EMAFC7G model.

Anticipated Cumulative Daily Project-Related Emissions Associated with Buildout of the Proposed General Plan (lbs./day)

	Stationary Source Emissions		Moving Source Emissions		Threshold Criteria*
	Power Plants	Natural Gas Consumption	Vehicles at 50mph**	Total Pounds Per Day	Total Pounds Per Day
Carbon Monoxide	503.8	416.8	23,071.01	23,991.61	550.00
Nitrogen Oxides	2,897.0	1,943.3	4,732.51	9,572.81	100.00
Particulates	100.7	4.1	197.18	301.98	150.00
ROCs	25.1	110.4	887.35	1,022.85	75.00

* Threshold criteria offered by the South Coast Air Quality Management District for assistance in determining the significance of air quality impacts. Source: "CEQA Air Quality Handbook," Prepared by South Coast Air Quality Management District, April 1993.

** Source: EMFAC7EG Emissions Model, California Air Resources Board.

As can be seen from the daily cumulative emissions table above, the overall projected emissions re-calculations associated with the somewhat conservative General Plan buildout scenario shown an overall reduction in emissions when compared to those set forth in the Draft EIR.

C.-3. Comment: Rule 2202 - On-Road Motor Vehicle Mitigation Options: It is stated on page 2-18 of Appendix E that Regulation XV (Rule 1501) is one of the SCAQMD rules that the City of Desert Hot Springs is subject to. Please note that Regulation XV or Rule 1501 has been replaced by Rule 2202 - On-Road Motor Vehicle Mitigation Options, since December 1995. Rule 2202 currently applies to employees or employer sites with 250 or more employees. Please revise this section in the Final EIR.

C.-3. Response: Comment noted and hereby incorporated by reference in the Program EIR.

C.-4. Comment: Project Consistency: The DEIR does not address the issue of project consistency with the regional and local air quality plans. Both CEQA and the California planning, zoning and development laws require projects to be consistent with the jurisdiction's air quality goals and objectives. Please correct this omission in the Final EIR.

C.-4. Response: Comment noted. The City of Desert Hot Springs and the Coachella Valley are currently subject to the 1997 Air Quality Management Plan (AQMP) and the State Implementation Plan for PM_{10} in the Coachella Valley. As mentioned in the Draft EIR, project related emissions will be spread over the long-term life of General Plan buildout, and will not be emitted in any short-term or concentrated manner. As buildout occurs, any implementation of the Land Use Element will be regulated to comply and remain consistent with all regional and local air quality plans.

D. RIVERSIDE COUNTY WASTE MANAGEMENT DEPARTMENT

D-1. Comment:: The following landfill information updates data included in the DEIR:

El Sobrante Landfill: As of July 1, 2000, the landfill had an overall remaining disposal capacity of approximately 3,022,982 tons. During the June 1, 1999 through May 31, 2000 period, the landfill received an average of 3,053 tons per day of waste (1,744 tons per day/in-County, 1,309 tons/out-of-County).

Lamb Canyon Landfill: As of July 1, 2000, the landfill had a remaining disposal capacity of approximately 5,647,887 tons. During the June 1, 1999 through May 31, 2000 period, the landfill received an average of 490 tons per day. The Lamb Canyon Landfill also operates as a long-term disposal site.

Badlands Landfill: As of July 1, 2000, the landfill had an overall remaining disposal capacity of approximately 11,037,297 tons. During the June 1, 1999 through May 31, 2000 period, the landfill received an average 1,425 tons per day.

Edom Hill Landfill: As of July 1, 2000, the landfill had an overall remaining capacity of 1,643,097 tons. During the June 1, 1999 through May 31, 2000 period, the landfill received an average 1,261 tons per day.

D-1. Response: Comment noted and hereby incorporated by reference into the General Plan EIR.

D.-2. Comment: The Coachella Transfer Station opened on July 3, 2000. Please be advised that the City of Cathedral City is in the process of considering several waste-related projects, including a transfer waste facility.

D.-2. Response: Comment noted. The City is aware of the subject Cathedral City projects currently under consideration and is monitoring their progress.

D.-3. Comment: The impacts discussion does not include project estimates of construction and green waste resulting form the project. The Department encourages the implementation of the mitigation measures listed in the document, which address construction/green waste components of the waste stream.

D.-3. Response: Comment noted. According to the California Integrated Waste Management Board and as cited in the City's Draft 1999 AB 939 Annual Report and Waste Diversion Study[2], a total of about 21,389 tons of waste was generated in 1999, of which approximately 15,627 tons were landfilled and the balance (5,762 tons) was diverted. Of this 15,627 tons landfilled by the City, 9,742 tons was landfilled through the local hauler and 5,885 tons were landfilledby self-haul disposal. Total waste generated equates to approximately 1.39 tons per capita per year.

In 1999, the average household size was 2.78 persons. Based upon a complete buildout of the General Plan study area and at 100 percent residential occupancy, the City planning area would have a maximum credible population of about 199,748 and could generate approximately 277,650 tons of domestic, commercial, industrial demolition and other waste per year. Applying the 1999 diversion rate of 26.94 percent, solid waste to landfills would total approximately 203,000 tons per year. This number is the worst possible case and future population and per capita waste generation are expected to be substantially less. Furthermore, the City is expected to divert a minimum of 50% of waste generated, which will also substantially reduce the total waste landfilled.

As cited in the referenced AB 939 report, the hauler states that they have identified potential accuracy problems with the Countywide Tonnage Tracking System as it relates to accounting the origin of solid waste coming into the landfill. If these discrepancies are correct, they may substantially overstate the total landfilled solid waste delivered by self-haulers originating in Desert Hot Springs. The suggested discrepancies also would have a significant effect on the City's actual solid waste diversion rate.

The City realizes the importance of solid waste diversion and recycling. It has directed its hauler to increase and enhance diversion efforts. The City will fully implement policies and programs set forth in the General Plan and mitigation measures found in the EIR which address solid waste management and disposal.

D.-4. Comment: The DEIR does not indicate whether the City of Desert Hot Springs has attained the AB 939 requirement to reduce waste disposal by 50 percent beginning in the year 2000. The DEIR also does not assess whether the mitigation measures identified will achieve this standard. To promote recycling, the Department recommends the following additional measure:

2 "Draft City of Desert Hot Springs Waste Diversion & 1999 AB 939 Annual Report", prepared by Robert W. Kuznik for Desert Valley Disposal. June 2000.

i. The California Solid Waste Reuse and Recycling Act of 1991 requires that adequate areas for collecting and loading re-cyclable materials be provided in public facilities, commercial projects, business areas, multi-family residential projects with five or more units and detached, single family residential projects where solid waste is collected and loaded in a location which serves five or more units.

D.-4. Response: As referenced above, based upon data for 1999 from the California Integrated Waste Management Board, approximately 26.94 percent of all solid waste collected in Desert Hot Springs was successfully diverted from landfilling. The hauler has estimated that due to inaccuracies in tracking at the Edom Hill landfill, the diversion rate for 1999 was closer to 31.3 percent. In an effort to increasing recycling and other diversion efforts, the hauler has expanded the recycled materials program to include 16 additional solid waste categories, including magazines with color and coated stock.

The hauler is also implementing a mobile buy-back system pilot program to see if there is sufficient interest to make permanent. Other program changes are being studied and/or implement that should also further solid waste recycling, including charging some customers by actual rather than estimated weight, mandatory recycling of construction and demolition materials, and other approaches to enhance diversion.

The effort to reduce solid waste generation and landfilling, the percentage being landfilled and that portion being diverted through recycling programs includes implementation of the mitigation measures set forth in the General Plan EIR, which will augment the programs of the hauler. It is not yet known whether the hauler will be able to meet the 50 percent diversion target during calendar year 2000. However, the City and hauler have committed to meeting this target as soon as is reasonably possible.

E. SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS

Introduction

Comments received from the Southern California Association of Governments (SCAG) focus on the responsiveness of the General Plan and Program EIR to the various policies and programs of the SCAG Growth Management Chapter and other sections of the Regional Comprehensive Plan and Guide. These policies and programs are first cited in *Italics* and then SCAG staff comments proper are restated. While several of the comments are directed at the General Plan rather than the DEIR, this opportunity is taken to both recognize SCAG's comments and to provide additional response, as appropriate.

E-1. Comment: The Draft EIR does not address the relationship of the proposed project to **applicable regional plans** as required by Section 15125 [d] of *Guidelines for Implementation of the California Environmental Quality Act.*

The Final EIR should address the relationships (consistency with core policies and support of ancillary policies) to SCAG's Regional Comprehensive Plan and Guide, utilizing commentary from the following detailed SCAG staff comments. The response should also discuss any inconsistencies between the proposed project and applicable regional plans. We suggest that you identify the specific policies, by policy number, with a discussion of consistency or support with each policy.

E-1. Response: Comment noted. The responses below address each of the issue areas raised in the SCAG comment letter.

E-2. Comment: **The Growth Management Chapter (GMC)** of the Regional Comprehensive Plan and Guide contains a number of policies that are particularly applicable to the City of Desert Hot Springs General Plan Update.

Core Growth Management Policies

3.01 The population, housing, and jobs forecasts, which are adopted by SCAG's Regional Council and that reflect local plans and policies, shall be used by SCAG in all phases of implementation and review.

<u>SCAG staff comments.</u> The Draft EIR references the adopted RTP 1998 SCAG's Population, Household and Employment forecasts for the City of Desert Hot Springs on page III-167. The Project is consistent with this core RCPG policy.

E-2. Response: Comment noted.

E-3. Comment: *3.03 The timing, financing, and location of public facilities, utility systems, and transportation systems shall be used by SCAG to implement the region's growth policies.*

SCAG Staff Comments. The Draft EIR does not present a discussion on Project phasing and timing. It would be helpful if the Final EIR would provide a discussion and address the manner in which the Project is supportive or detracts from the achievement of this policy. Based on the information provided in the Draft EIR, we are unable to determine if the Project is consistent with this core RCPG policy.

E-3. Response: The "Project" is a Comprehensive General Plan with a planning area of nearly 37,000 acres. It is difficult to predict the timing, much less the type of financing and location of future infrastructure. The General Plan includes a wide variety of policies and programs that help to assure that growth and development in the community is orderly and timely. The City coordinates closely with the Mission Springs Water District, Riverside County Flood Control District and the coordinating Coachella Valley Association of Governments (CVAG) in the implementation of flood control, water and sewer, and the Transportation Uniform Mitigation Fee program, respectively. Policies and programs furthering this coordination and cooperation are dispersed throughout the General Plan and EIR.

E-4. Comment: The Regional Transportation Plan (RTP) also has goals, objectives, policies and actions pertinent to this proposed project. This RTP links the goal of sustaining mobility with the goals of fostering economic development, enhancing the environment, reducing energy consumption, promoting transportation-friendly development patterns, and encouraging fair and equitable access to residents affected by socio-economic, geographic and commercial limitations. Among the relevant goals, objectives, policies and actions of the RTP are the following:

Core Regional Transportation Plan Policies

4.01 Transportation investments shall be based on SCAG's adopted Regional Performance Indicators.

SCAG Staff Comments. The Draft EIR does not provide a discussion on Transportation investments based on the following SCAG adopted Regional Performance Indicators.

Mobility - Transportation Systems should meet the public need for improved access, and for safe, comfortable, convenient and economical movement of people and goods.
•Average Work Trip Travel Time in Minutes - 22 minutes
•PM Peak Highway Speed - 33 mph
•Percent of PM Peak Travel in Delay (All Trips) - 33%

Accessibility - Transportation Systems should ensure the ease with which opportunities are reached. Transportation and land use measures should be employed to ensure minimal time and cost.
•Work Opportunities within 25 Minutes - 88%

Environment - Transportation Systems should sustain development and preservation of the existing system and the environment. (All Trips)
•Meeting Federal and State Standards - Meet Air Plan Emission Budgets

Reliability - Reasonable and dependable levels of service by mode. (All Trips)
•Transit - 63%
•Highway - 76%

Safety - Transportation Systems should provide minimal, risk, accident, death and injury. (All Trips)
•Fatalities Per Million Passenger Miles - 0.008
•Injury Accidents - 0.929

Livable Communities - Transportation Systems should facilitate Livable Communities in which all residents have access to all opportunities with minimal travel time. (All Trips)
•Vehicle Trip Reduction - 1.5%
•Vehicle Miles Traveled Reduction - 10.0%

Equity - The benefits of transportation investments should be equitably distributed among all ethnic, age and income groups. (All Trips)
•Low-Income (Household Income $12,000) Share of Net Benefits - Equitable Distribution of Benefits

Cost Effectiveness - Maximize return on transportation investment. (All Trips)
•Net Present Value - Maximum Return on Transportation Investment
•Value of a Dollar Invested - Maximum Return on Transportation Investment

The Final EIR should address the manner in which the Project is supportive of or detracts from the achievement of the eight core RTP objectives. Based on the information provided, we are unable to determine whether the Project is consistent with this core RCPG policy.

E-4. Response: The Desert Hot Springs and Coachella Valley transportation systems currently meet and in the future will meet the public need for improved access, and will continue to provide safe, comfortable, convenient and economical movement of people and goods. Trips originating in Desert Hot Springs are project to be well below the 22 minute travel time target, well above the 33 mph average speed target and well below (~10%) PM peak in terms of travel delay.

The transportation systems has been designed so that even at community buildout the system will minimalize travel time and cost to individuals, builders of the roadway system and the local and regional economy. The Land Use Plan in the General Plan provides a good balance between jobs and housing. It should also be noted that almost all employment opportunities in the Coachella Valley are within a 25 minute travel distance of Desert Hot Springs.

The existing and planned City and regional transportation systems as modeled in the 2020 CVATS model prepared by SCAG are expected to sustain development and preserve the existing system and the environment. The region is also a leader in the use of compressed natural gas for mass transit (Sunline Transit) and in local government fleets. The City and region are expected to meet or better the emission budgets established by SCAG.

The General Plan EIR analyses a worst case scenario with regard to future traffic volumes, impacts on local and regional roads, and the scale of infrastructure needed to meet these possible, if unlikely, levels of demand. As shown in the traffic impact analysis in the Draft EIR and technical appendix, with very few exceptions the City and regional system is expected to continue to provide reasonable and dependable levels of service by all modes.

The goals, policies and programs of the Circulation Element and the mitigation measures set forth in the Draft EIR are designed to preserve roadway capacity and to minimize the type of conditions most closely associated with unsafe transportation systems. The City and regional system provides minimal risk, accident, death and injury-producing conditions. There should be no problem on either the City or regional level in meeting the injury accident or fatality standards set forth by SCAG.

The CVAG CVATS transportation model and the TUMF program are the first level of assurance that transportation costs are equitably distributed across all socio-economic sectors. The City and region have an excellent transit authority and system that provides valley-wide access to all sectors of the community. The polices and programs found in the Circulation Element support and promote the equitable distribution of infrastructure investment and system availability.

E.-5. Comment: *4.02 Transportation investments shall mitigate environmental impacts to an acceptable level.*

SCAG staff comments. The Draft EIR in Section III-B (Traffic/Circulation) identifies transportation and circulation impacts, and details the measures to mitigate these impacts on pages III-33 through III-38. The Project is consistent with this core RCPG policy.

E-5. Response: Comment noted.

E.-6. Comment: *4.04 Transportation Control Measures shall be a priority.*

SCAG staff comments. The Draft EIR includes mitigation measures that support the implementation of Transportation Control Measures. Mitigation Measure M, in Section III-H (Air Quality), encourages the implementation of telecommuter programs to reduce traffic. The Project is consistent with this core RCPG policy.

E-6. Response: Comment noted.

E-7. Comment: *4.16 Maintaining and operating the existing transportation system will be a priority over expanding capacity.*

SCAG staff comments. The Draft EIR, on page III-36, discusses circulation system upgrades, which should maintain and operate the existing transportation system. The Project is consistent with this core RTP policy.

E-7. Response: Comment noted.

E-8. Comment: The Growth Management goals to develop urban forms that enable individuals to spend less income on housing cost, that minimize public and private development costs, and that enable firms to be competitive, strengthen the regional strategic goal to stimulate the regional economy. The evaluation of the proposed project in relation to the following policies would be intended to guide efforts toward achievement of such goals and does not infer regional interference with local land use powers.

3.04 Encourage local jurisdictions' efforts to achieve a balance between the types of jobs they seek to attract and housing prices.

SCAG staff comments. The Draft EIR does not include a discussion on jobs and housing balance. It would be helpful if the Final EIR would provide a discussion and address the manner in which the Project is supportive or detracts from the achievement of this policy. Based on the information provided in the Draft EIR, we are unable to determine of the Project is supportive of this ancillary RCPG policy.

E-8. Response: Desert Hot Springs and the Coachella Valley are unique in that spa hotels, destination resorts, second/vacation homes and tourism are major components of the economy. The area has one of the best balanced housing markets in Southern California. In the City of Desert Hot Springs the median home value in 1990 was $74,800. In 1996, the median home value was estimated to be $79,500 (Multiple Listing Service). In the years 1997 through 1999 property values throughout the City decreased by as much as 27%. The City currently attracts home building in the range of up to $500,000 although housing in the range of $70,000 to $100,000 is the most predominant sector of the City's housing market, as discussed in the General Plan Housing Element.

The General Plan also provides for a substantial commercial and industrial base that, at buildout, would result in up to approximately 10 million square feet of commercial space. This does not include the more than 8,600 hotel rooms that could be developed under the new General Plan., The Plan also could allow up to 37.3 million square feet of industrial space to be constructed and does not take into account the 1,875 acres of windfarm development and the well-paying jobs this industry generates.

The General Plan Land Use and Economic Development Elements provide the wherewithal for the City to enhance the jobs/housing balance in the community, and will continue to attract commercial and industrial development that provides more and better-paying jobs. Through General Plan policies and programs, the City will also be working to attract more of the retirement and vacation/second home resident, as well as the vacationing public to bring a higher level of per capita and household discretionary income into the community.

E-9. Comment: *3.05 Encourage patterns of urban development and land use, which reduce costs on infrastructure construction and make better use of existing facilities.*

SCAG staff comments. The Draft EIR in Sections III-B (Traffic/Circulation) and III-K (Public Services and Facilities) acknowledges that the Project will maximize the use of existing infrastructure and improve infrastructure deficiencies to meet the needs of the proposed Project. Mitigation measures outlined in each section will address identified impacts. The Project is supportive of this RCPG policy.

E-9. Response: Comment noted.

E-10. Comment: *3.08 Encourage subregions to define economic strategy to maintain economic viability of the subregion, including the development and use of marketing programs, and other economic incentives, which support the attainment of subregional goals and policies.*

SCAG staff comments. The Draft EIR in Section III-K (Socio-Economic Resources) includes a number of mitigation measures that focus on improving the economic base of the City of Desert Hot Springs. The Project is supportive of this ancillary RCPG policy.

E-10. Response: Comment noted.

E-11. Comment: *3.09 Support local jurisdictions' efforts to minimize the cost of infrastructure and public service delivery, and efforts to seek new sources of funding for development and the provision of services.*

SCAG staff comments. See SCAG comments on policy 3.05. The Project is supportive of this ancillary RCPG policy.

E-11. Response: Comment noted.

E-12. Comment: *3.10 Support local jurisdictions' actions to minimize red tape and expedite the permitting process to maintain economic vitality and competitiveness.*

SCAG staff comments. The Draft EIR only addresses subjects that may have adverse environmental impacts. It is written in a concise manner, where all possible adverse impacts are mitigated this will help minimize red tape, and help maintain the economic vitality and competitiveness of the City of Desert Hot Springs. In addition, the Draft EIR, on pages III-15 and III-174 includes mitigation measures, which will also help to minimize red tape, and help maintain the economic vitality and competitiveness of the City of Desert Hot Springs. The Project is supportive of this ancillary RCPG policy.

E-12. Response: Comment noted.

E-13. Comment: The Growth Management goals to attain mobility and clean air goals and to develop urban forms that enhance quality of life, that accommodate a diversity of life styles, that preserve open space and natural resources, and that are aesthetically pleasing and preserve the character of communities, enhance the regional strategic goal of maintaining the regional quality of life. The evaluation of the proposed project in relation to the following policies would be intended to provide direction for plan implementation, and does not allude to regional mandates.

3.11 Support provisions and incentives created by local jurisdictions to attract housing growth in job rich subregions and job growth in housing subregions.

SCAG staff comments. See SCAG staff comment on policy 3.04. It would be helpful if the Final EIR would provide a discussion and address the manner in which the Project is supportive or detracts from the achievement of this policy. Based on the information provided in the Draft EIR, we are unable to determine if the Project is supportive of this ancillary RCPG policy.

E-13. Response: Please see Response E-8, above. The City realizes that it is relatively housing rich and jobs poor. As noted above, the City General Plan provides policies, programs and a land use allocation model that are designed to increase local commercial, resort and industrial development that builds on the City identified comparative economic advantages. The recently assigned RHNA numbers show that the City is already identified as a strong provider of affordable housing. The preparation of a multi-pronged economic development strategy is part of this approach.

In recent years, the City has been approached by a local jurisdiction offering to provide the City with a portion of its RDA 20% set aside funds if it would build that city's required affordable housing. In the interest of providing a more balanced housing market and economy, the City declined this offer, which also appears to be in direct conflict with SCAG policies.

E-14. Comment: *3.12 Encourage existing or proposed local jurisdictions' programs aimed at designing land uses which encourage the use of transit and thus reduce the need for roadway expansion, reduce the number of auto trips and vehicle miles traveled, and create opportunities for residents to walk and bike.*

SCAG staff comments. The Draft EIR in Section III-B (Traffic/Circulation) includes mitigation measures that encourage the coordination and implementation of transit and transit facilities, and bikeways, pedestrian and/or equestrian trails. The Project is supportive of this ancillary RCPG policy.

E-14. Response: Comment noted.

E-15. Comment: *3.13 Encourage local jurisdictions' plans that maximize the use of existing urbanized areas accessible to transit through infill and development.*

SCAG staff comments. While the Draft EIR does not directly address the subject of transit service to serve and provide access to new development and redeveloped areas, mitigation measure "I" on page III-38 advocates the, "...continued coordination with the Sunline Transit Agency to establish transit stops...". The Project is supportive of this ancillary RCPG policy.

E-15. Response: Comment noted.

E-16. Comment: *3.14 Support local plans to increase density of future development located at strategic points along the regional commuter rail, transit systems, and activity centers.*

SCAG staff comments. See SCAG staff comments on policies 3.12 and 3.13. The project is supportive of this ancillary RCPG policy.

E-16. Response: Comment noted.

E-17. Comment: *3.15 Support local jurisdictions' strategies to establish mixed-use clusters and other transit-oriented developments around transit stations and along transit corridors.*

SCAG staff comments. See SCAG staff comments on policy 3.14. The Project is supportive of this ancillary RCPG policy.

E-17. Response: Comment noted.

E-18. Comment: *3.16 Encourage developments in and around activity centers, transportation corridors, underutilized infrastructure systems, and areas needing recycling and redevelopment.*

SCAG staff comments. See SCAG staff comments on policy 3.14. The project is supportive of this ancillary RCPG policy.

E-18. Response: Comment noted.

E-19. Comment: *3.17 Support and encourage settlement patterns, which contain a range of urban densities.*

SCAG staff comments. The Draft EIR in Section III-A (Land Use and Compatibility) identifies ranges of urban densities. The project is supportive of this ancillary RCPG policy.

E-19. Response: Comment noted.

E-20. Comment: *3.18 Encourage planned development in locations least likely to cause adverse environmental impact.*

SCAG staff comments. The Project is proposed in a manner, which will minimize adverse environmental impacts. Mitigation measures included in the Draft EIR have been developed to address identified impacts. The City of Desert Hot Springs should carefully consider the adequacy of these measures. The Project is supportive of this ancillary RCPG policy.

E-20. Response: Comment noted.

E-21. Comment: *3.19 SCAG shall support policies and actions that preserve open space areas identified in local, state, and federal plans.*

SCAG staff comments. The Draft EIR, on page III-14, states, "The Plan provides for the protection of special, valuable or sensitive resource areas through the application of Open Space land use designations..." The Project is supportive of this ancillary RCPG policy.

E-21. Response: Comment noted.

E-22. Comment: *3.20 Support the protection of vital resources such as wetlands, groundwater recharge areas, woodlands, production lands, and lands containing unique and endangered plants and animals.*

SCAG staff comments. The Draft EIR in Section III-F (Biological Resources) acknowledges that development facilitated by implementation of the proposed Project will result in direct and indirect impacts to certain plant and animal species. Mitigation measures outlined in this Section have been developed to address identified impacts. The City of Desert Hot Springs should carefully consider the adequacy of these measures. The Project is supportive of this ancillary RCPG policy.

E-22. Response: Comment noted.

E-23. Comment: *3.21 Encourage the implementation of measures aimed at the preservation and protection of recorded and unrecorded cultural resources and archaeological sites.*

SCAG staff comments. The Draft Program EIR in Section III-G (Cultural Resources) acknowledges that the proposed Project could potentially result in direct and/or indirect disturbance or destruction of sensitive historic and archeological resources. Mitigation measures included in this Section developed to address identified impacts. The City of Desert Hot Springs should carefully consider the adequacy of these measures. The Project is supportive of this ancillary RCPG policy.

E-23. Response: Comment noted.

E-24. Response: *3.22 Discourage development, or encourage the use of special design requirements, in areas with steep slopes, high fire, flood, and seismic hazards.*

SCAG staff comments. The Draft EIR in Sections III-C (Soils/Geology) and III-D (Hydrology) identifies potential impacts related to seismicity, liquefaction, soils, slope instability, existing and proposed stormwater facilities and the Willow Hole Preserve. Mitigation measures outlined in these Sections have been developed to address the identified impacts through the implementation of development codes and specific requirements. The Project is supportive of this ancillary RCPG policy.

E-24. Response: Comment noted.

E-25. Comment: *3.23 Encourage mitigation measures that reduce noise in certain locations, measures aimed at preservation of biological and ecological resources, measures that would reduce exposure to seismic hazards, minimize earthquake damage, and to develop emergency response and recovery plans.*

SCAG staff comments. See SCAG staff comments on policies, 3.18, 3.20, 3.21 and 3.22. The Draft EIR in Section III-I (Noise) acknowledges potential noise impacts related to traffic, stationary noise sources and construction activities. Mitigation measures included in this Section have been developed to address identified impacts. The City of Desert Hot Springs should carefully consider the adequacy of these measures. The Project is supportive of this ancillary RCPG policy.

E-25. Response: Comment noted.

E-26. Comment: The Growth Management Goal to develop urban forms that avoid economic and social polarization promotes the regional strategic goal of minimizing social and geographic disparities and of reaching equity among all segments of society. The evaluation of the proposed project in relation to the policy stated is intended guide direction for the accomplishment of this goal, and does not infer regional mandates and interference with local land use powers.

3.24 Encourage efforts of local jurisdictions in the implementation of programs that increase the supply and quality of housing and provide affordable housing as evaluated in the Regional Housing Needs Assessment.

SCAG staff comments. The Draft EIR, in Section III-A (Land Use Compatibility) provides a discussion on Residential Land Uses. The discussion suggests that there is the potential for an additional 63,889 dwelling units at buildout. The Draft EIR, however, does not provide a discussion on programs that could increase the supply and quality of housing and the provision of affordable housing. It would be helpful if the Final EIR would provide a discussion and address the manner in which the Project supportive or detracts from the achievement of this policy. Based on the information provided in the Draft EIR, we are unable to determine if the Project is supportive of this ancillary RCPG policy.

E-26. Response: The General Plan Housing Element and Economic Development Element both are responsive to this policy. The Draft Housing Element, which is in its second review with HCD, is responsive to and sets as quantitative objectives the RHNA numbers recently established by SCAG. It is worth noting that SCAG recognizes the current imbalance in the value of housing in the community, the highest RHNA allocation for the 1998-2005 period being for High Income housing. The Housing Element establishes 15 policies and 13 programs designed to meet the City's housing requirements and to enhance the balance of housing product available in the City. Numerous housing and economic development policies and programs also address issues of housing rehabilitation and conservation through the use of RDA funds, grants, low interest loans and through other financing mechanisms.

E-27. Comment: *Support local jurisdictions and other service providers in their efforts to develop sustainable communities and provide, equally to all members of society, accessible and effective services such as: public education, housing, health care, social services, recreational facilities, law enforcement, and fire protection.*

SCAG staff comments. The Draft EIR, in Section III-K (Public Services and Facilities) acknowledges that the potential build out of the General Plan could result in impacts to services and facilities. Mitigation measures outlined in this Section address identified impacts. The City of Desert Hot Springs should carefully consider the adequacy of these measures. The Project is supportive of this ancillary RCPG policy.

E-27. Response: Comment noted.

E-28. Comment: *5.07 Determine specific programs and associated actions needed (e.g., indirect source rules, enhanced use of telecommunications, provision of community based shuttle services, provision of demand management based programs, or vehicle-miles-traveled/emission fees) so that options to command and control regulations can be assessed.*

SCAG staff comments. The Draft EIR, in Section III-H (Air Quality), includes mitigation measures that encourages developers to implement demand management programs, the coordination of mass transit services, and encourage the use of alternative, clean energy sources for transportation. The Project is consistent with this core RCPG policy.

E-28. Response: Comment noted.

E-29. Comment: *5.11 Through the environmental document review process, ensure that plans at all levels of government (regional, air basin, county, subregional and local) consider air quality, land use, transportation and economic relationships to ensure consistency and minimize conflicts.*

SCAG staff comments. The Draft EIR, in Section III-H (Air Quality) discusses the consistency of the proposed Project with regional and local air quality policies and includes mitigation measures for impacts to air quality. The Project is consistent with this core RCPG policy.

E-29. Response: Comment noted.

E-30. Comment: The Water Quality Chapter core recommendations and policy options relate to the two water quality goals: to restore and maintain the chemical, physical and biological integrity of the nation's water; and, to achieve and maintain water quality objectives that are necessary to protect all beneficial uses of all waters.

11.06 Clean up the contamination in the region's major groundwater aquifers since its water supply is critical to the long-term economic and environmental health of the region. The financing of such clean-ups should leverage state and federal resources and minimize significant impacts on the local economy.

SCAG staff comments. The Draft EIR in Section III-E (Water Resources/Quality) discusses the subject of groundwater. Mitigation measures A and C on page III-78 have been developed to address impacts to groundwater resources. The Project is supportive of this core RCPG policy.

E-30. Response: Comment noted.

E-31. Comment: *11.07 Encourage water reclamation throughout the region where it is cost-effective, feasible, and appropriate to reduce reliance on imported water and wastewater discharges. Current administrative impediments to increased use of wastewater should be addressed.*

SCAG staff comments. The Draft EIR does not address the subject of water reclamation. It would be helpful if the Final EIR would provide a discussion and address the manner in which the Project is supportive or detracts from the achievement of this policy. Based on the information provided in the Draft EIR, we are unable to determine if the Project is supportive of this core RCPG policy.

E-31. Response: The southern portion of the planning area is located within the service boundary of the Coachella Valley Water District (CVWD), which has tertiary treatment capacity at its Cook Street plant of 10 million gallons per day. This effluent is sold to golf courses for irrigation water. At this time, CVWD does not have collection facilities in this portion of its service area.

Mission Springs Water District is the primary service provider in the planning area and has secondary treatment at its Horton Plant located within the City limits. The District has indicated its willingness to develop tertiary treatment facilities once end-users for tertiary treated water are located within the District's service boundaries and can be cost-effectively served. Currently, the District uses percolation ponds for secondary treated water, which provides an additional filtration phase and returns treated water to the aquifer.

E-32. Comment: *9.01 Provide adequate land resources to meet the outdoor recreation needs of the present and future residents in the region and to promote tourism in the region.*

SCAG staff comments. The Draft EIR in Section III-A (Land Use Compatibility) suggests that the City of Desert Hot Springs have adequate land resources to meet outdoor recreation needs. The project is supportive of this ancillary RCPG goal.

E-32. Response: Comment noted.

E-33. Comment: *9.02 Increase the accessibility to open space lands for outdoor recreation.*

SCAG staff comments. See SCAG staff comments for goal 9.01. The Project is supportive of this ancillary RCPG goal.

E-33. Response: Comment noted.

E-34. Comment: *9.03 Promote self-sustaining regional recreation resources and facilities.*

SCAG staff comments. See SCAG staff comments for goal 9.01. The Project is supportive of this ancillary RCPG goal.

E-34. Response: Comment noted.

E-35. Comment: *9.04 Maintain open space for adequate protection of lives and properties against natural and man-made hazards.*

SCAG staff comments. The Draft EIR does not discuss the subject of maintenance of open space for adequate protection of lives and properties against natural and man-made hazards. It would be helpful if the Final EIR would provide a discussion and address the manner in which the Project is supportive or detracts from the achievement of this policy. Based on the information provided in the Draft EIR, we are unable to determine if the Project is supportive of this ancillary RCPG goal.

E-35. Response: The City currently has substantial areas of open space that include lands mountainous private lands, as well as lands managed by the Bureau of Land Management, the Riverside County Flood Control District, and the City. These lands, totalling more than 8,300 acres, are preserved as sensitive wildlife areas, flood control facilities and as stormwater detention facilities.

Consistent with the requirements of the state Division of Mines and Geology, Department of Conservation, development planned on lands crossed by a potentially active fault must provide minimum setbacks which can be used as greenbelts or other types of open space.

The City has several approved Specific Plans shown on the General Plan land use maps that incorporate flood ways into the design of golf courses and other useable open space. This approach is being used throughout the community to enhance the provision of open space lands while protecting lives and structures from potential damage.

E-36. Comment: *9.05 Minimize potentially hazardous developments in hillsides, canyons, areas susceptible to flooding, earthquakes, wildfire and other known hazards, and areas with limited access for emergency equipment.*

SCAG staff comments. The Draft EIR does not discuss the subject of potentially hazardous developments, and areas with limited access for emergency equipment. It would be helpful if the Final EIR would provide a discussion and address the manner in which the Project is supportive or detracts from the achievement of this policy. Based on the information provided in the Draft EIR, we are unable to determine if the Project is supportive of this ancillary RCPG goal.

E-36. Response: The General Plan land use map, as well as the topography, flooding and geotechnical maps provided in the EIR, clearly delineate the constraint areas cited in the comment. Most areas of potential flooding are designated as OS/FW (open space/ floodways). Other portions of the planning area are constrained by strong wind and blowing sand. Land use designations in these areas are limited to windfarm, industrial and very low density residential. Also please see Response E-35.

E-37. Comment: *9.06 Minimize public expenditure for infrastructure and facilities to support urban type uses in areas where public health and safety could not be guaranteed.*

SCAG staff comments. The Draft EIR does not discuss the subject of public expenditures for infrastructure and facilities. It would be helpful if the Final EIR would provide a discussion and address the manner in which the Project is supportive or detracts from the achievement of this policy. Based on the information provided in the Draft EIR, we are unable to determine if the Project is supportive of this ancillary RCPG goal.

E-37. Response: The Economic Development Element of the General Plan requires that the City assure sufficient infrastructure and capital facilities in all development areas. These include the provision of adequate stormwater facilities. The City is responsible for assuring the provision of adequate roads, local flood control facilities, and police and fire protection services.

Typically, new development is required to provide its fair share of roadway improvements and to extend water and sewer facilities. New policies and programs in the General Plan require that new development, except single family development on large or isolated lots, extend and connect to the community sewage collection system. The City General Plan also strongly encourages infill development in areas where full infrastructure already exists.

E-38. Comment: *9.08 Develop well-managed viable ecosystems for known habitats of rare, threatened and endangered species, including wetlands.*

SCAG staff comments. The Draft EIR, in Section III-I (Biological Resources), includes mitigation measures that support fee payments and the development of a habitat conservation plan for multiple wildlife species.

E-38. Response: Comment noted.

E-39. Comment: As noted in the Summary of SCAG Staff Comments, the Final Program EIR should address the relationships (consistency with core policies and support of ancillary policies) to SCAG's Regional Comprehensive Plan and Guide and discuss any inconsistencies between the proposed project and applicable regional plans.

E-39. Response: As noted in the responses provided above, the Draft Comprehensive General Plan and Program EIR are consistent with and responsive to the core and ancillary policies of the SCAG Comprehensive Plan and Guide. No meaningful inconsistencies exist between these two sets of documents.

E-40. Comment: All mitigation measures associated with the project should be monitored in accordance with CEQA requirements.

E-40. Response: Comment noted.

F. CITY OF CATHEDRAL CITY

F-1. Comment: On November 4, 1992, the City Council of the City of Cathedral City, authorized the execution of an agreement regarding the future mutual boundaries of the Cities of Cathedral City and Desert Hot Springs. Both parties subsequently signed the Agreement, attached. Under this signed Agreement, the city limits for Cathedral City would eventually be moved north to 20th Avenue, and would include all of Sections 20, 21 and 22 of Township 3 North, Range 5 East, and that part of Section 30 lying easterly of the centerline of Palm Drive.

The document recognizes that the Agreement may not be binding on future City Councils, however, the Agreement "expresses the intent of the parties, based on extended discussions and negotiations". Further, the Agreement states "the best interests of each City will be best served by continuing to observe this Agreement... " The City Council of the City of Cathedral City continues to respect this Agreement.

Therefore, the City of Cathedral City anticipates the Draft Desert Hot Springs Comprehensive General Plan will be amended to reflect the attached Agreement.

F-1. Response: The City recognizes the referenced non-binding agreement. Nonetheless, the City has taken the opportunity to establish General Plan designations on both the east and west side of Palm Drive to establish a coherent land use pattern for this important "gateway" to the community of Desert Hot Springs.

While the City of Cathedral City currently enjoys immediate access to the Interstate-10 corridor, the City of Desert Hot Springs remains isolated from this important transportation and economic asset. Furthermore, the City has been reassessing the importance of this intersection, especially in light of the split jurisdiction that has been forced upon it with the extension of the Palm Springs city limits north of I-10 and west of Indian Avenue.

The subject Palm Drive/I-10 interchange is the single most important gateway into the City and as such the City intends to reopen discussions with Cathedral City regarding long-term municipal boundaries in this area.

F.-2. Comment The roadway type designation of Varner road, east of Mountain View in Desert Hot Springs is a "Major Arterial" with 110-foot right-of-way section. This is not consistent with the City of Cathedral's designation of "Major Highway" at a 100-foot right-of-way. The appropriate staff from each City should meet to address this inconsistency.

F-2. Response: A review of Cathedral City's current/adopted General Plan Circulation Plan shows that Varner Road is designated as an Arterial Highway with a 110 foot right-of-way and is planned to be striped to provide six travel lanes (see "Cathedral City General Plan Map" dated 4/29/92). In July, 1999 the Cathedral City's traffic consultant Endo Engineering conducted a CVATS-based traffic modeling of the Preferred Land Use Alternative for the revised General Plan, which has not yet been adopted. This traffic analysis also calls for Varner Drive to have a 110 foot right-of-way. Therefore, the 110 foot right-of-way proposed by Desert Hot Springs for this roadway is consistent with that on the current and revised General Plan Circulation Plan for Cathedral City.

Nonetheless, it is recommended that the two communities establish an on-going consultation and coordination process to optimize roadway design efforts. This measure is hereby included by reference into the General Plan EIR.

F.-3. Comment: The draft EIR identifies the projected build-out to be 49,500 vehicles per day on Varner Road. The models for Cathedral City and the CVAG CVATS do not reach these volumes under any scenario currently adopted. The previously projected maximum volume of any known study was 36,000 vehicles per day.

If Desert Hot Springs, through its General Plan, is projecting that development in Desert Hot Springs will promote significantly increased traffic volumes on Varner Road, then mitigation measures need to address impacts on Varner Road, east of the Desert Hot Springs City Limits. Currently, the condition of the roadway on Varner Road is such that any actual traffic increase in the near-term will cause probable failure of the asphalt, and a capacity level of worse than LOS D.

F-3. Response: Comment noted. As noted above, there does not appear to be a meaningful discrepancy with regard to the ultimate right-of-way that needs to be dedicated for Varner Road east of Palm Drive. It should be noted that the amount of traffic projected by the Desert Hot Springs General Plan update for Varner Road, between Palm Drive and Mountain View Road, is within 100 vehicle trips per day of that calculated for the existing Cathedral City General Plan. The Preferred Alternative Land Use model currently under consideration at Cathedral City for its General Plan update projects buildout traffic for this segment of Varner Road at 18,700 ADT. The differences arise from how the CVATS models are applied to traffic out side each planning area, that traffic being based upon the 2020 traffic model. Within each jurisdictions' planning area, the model assumes buildout of the planning area and therefore assigns the jurisdiction's maximum credible number of vehicle trips to these roadways.

The area where traffic volumes are highest on Varner are associated with traffic utilizing Mountain View Road. Several important considerations must be made, including those cited above.

The Cathedral City analyses for the existing and Preferred Land Use Alternative each assume that traffic outside the planning area will be that realized by the year 2020, while that noted for the General Plan roadways assumes community buildout. The same modeling effects occur in the Desert Hot Springs model. When the two Preferred Alternatives for the two City's General Plan amendments are compared they show a differential of about 3,000 ADT, a difference of about 6%. Clearly, the effects of the two General Plan, whether considering each Cities' current or proposed Preferred Land Use Alternative, the expected traffic volumes are substantially the same.

Nonetheless, it is recommended that the two communities establish an on-going consultation and coordination process to optimize roadway design efforts. This measures is hereby included by reference into the General Plan EIR.

F-4. Comment: The draft EIR refers to other documents and other agency reports which are either in place or in draft form. Although this is a practical approach and reflects the actual responsibilities of the various agencies (RCFCWCD, FEMA, CVWD, US Army Corps), the draft EIR does not provide enough synopsis of the actual plans and impacts of the downstream properties, such as Cathedral City. Additionally, the alternative plan maps show gaps and abrupt endings of natural and man-made drainage corridors.

F-4. Response: Comment noted. Both General Plan updates approach the subject mapping in this fashion. Luckily, the hydrologic and geotechnical conditions for each community were prepared by the same consultant, Earth Consultants International and, therefore, these maps can be laid side by side to provide a complete picture of these conditions as they affect both communities. With a copy of the Draft EIR for the Desert Hot Springs General Plan in-hand, Cathedral City staff can evaluate the interconnectedness of these conditions between the two communities.

G. CITY OF PALM SPRINGS

G-1. Comment: Thank you for giving us the opportunity to review the Draft Environmental Impact Report for the Desert Hot Springs General Plan. In reviewing the draft report, it appears that the proposed designation of Indian and Palm as an eight lane, divided, 134 foot urban arterial is inconsistent with the Palm Springs designation. It is also inconsistent with CVAG's plans for the I-10 interchanges. Under the CVAG plan, the Palm Drive bridge over I-10 is proposed as a six lane facility. Under the City's plan, the right-of-way width for Indian and Palm are both 110 feet.

G-1. Response: The traffic volumes for the subject roadway segment are a result of the focused traffic model runs for the Preferred Land Use Alternative for the General Plan. They are also consistent with traffic projections developed by Robert Kahn, John Kain & Associates for regional traffic volumes at this location, which were calculated separately for the Desert Hot Springs Annexation No. 22 and the Rancho Royale Specific Plan EIRs. The City of Palm Springs had this data in hand during its General Plan update process. Furthermore, the subject analysis for Desert Hot Springs are for buildout conditions, rather than for the year 2020. This may account for the discrepancies. As regards the design for the Indian Avenue/Interstate-10 interchange, the subject Urban Arterial designation does not imply similar geometrics for the interchange. Traffic onto Indian Avenue originating from Interstate-10 and 20th Avenue are driving the volumes that argue for the Urban Arterial designation.

Nonetheless, it is recommended that the two communities establish an on-going consultation and coordination process to optimize roadway design efforts. This measures is hereby included by reference into the General Plan EIR.

H. PALM SPRINGS UNIFIED SCHOOL DISTRICT

H-1. Comment: Public education is provided to the city by the Palm Springs Unified School District, which also serves the communities of Palm Springs, Cathedral City, Rancho Mirage, Thousand Palms and portion of the County of Riverside. The City currently hosts seven public schools, including Bubbling Wells Elementary, Two Bunch Palms Elementary, Edward L. Wenzlaff Elementary, Julius Corsini Elementary, Desert Springs Middle School, Desert Hot Springs High, and Desert Hot Springs Continuation High School. Many of the schools within the Palm Springs Unified School District are currently overcrowded, and efforts are continuing to fund and build additional facilities. At this time, there are no plans to construct new public schools in the General Plan planning area. Three private schools, including Community Children's Center, Palm Springs Christian Schools, and Storyland Preschool are also located in the City.

H-1. Response: Comment noted.

H.-.2. Comment: Page III-138: In 1986, the State Legislature approved AB 2926, which authorizes school districts to charge development fees for the construction and reconstruction of public schools. Statutory developer fees are currently $2.05 per square foot of residential development and $0.33 per square foot of commercial development. The City of Desert Hot Springs supports the collection of statutory school impact fees to fund the construction of local public schools. Operating costs for public schools are primarily covered by State Average Daily Attendance (ADA) payments.

H-2. Response: Comment noted.

H-3. Comment: Page III-140:
C.Leroy F. Green State School Building Lease-Purchase Law (There is a revised new state program.)
D. Lease-Purchase Arrangements (Funds must be available to accommodate the annual costs.)
E. Developer Fees - In 1986 the State Legislature approved AB 2926 (Chapter 887), which authorizes school districts to charge development fees to fund construction or reconstruction of schools. School fees currently stand at $2.05 per square foot of residential development and $0.33 per square foot of commercial development. Limits on the maximum fee that can be collected are set by Government Code Section 65995. Also applicable is Government Code Section 53080, constraining the issuance of development permits until proof of compliance with the School District's resolution has been provided.

H.-3. Response: Comment noted and hereby incorporated by reference into the General Plan and Program EIR.

I. SOUTHERN CALIFORNIA EDISON

I.-1. Comment: The General Plan for the City of Desert Hot Springs is located within the service territory of Edison. Edison's power distribution system is prepared to deliver the power by the State's electricity market to this area. The California Independent System Operator is the agency now responsible for managing the State's electric grid and securing power supplies.

The relocation, reconstruction, extension or under grounding of Edison's electrical distribution system which may be necessitated within the proposed area will be performed by Edison in accordance with Edison's effective Tariff Schedules approved by and filed with the California Public Utilities Commission.

I.-1. Response: Comment noted.

I.-.2. Comment: Please include the following comments in your report:
•any under ground districts formed should be limited to 12kV and below.
•It appears you are making no provisions for maintaining the the Dever-Palo Verde T/L corridor, as well as other transmission line corridors in and out of Devers. It is important to make sure these corridors are kept for energy delivery and not for open space or some other incompatible use.
•Edison requests that its properties and right of ways not be down zoned to open space or recreational zoning.

I.-2. Response: The Devers substation and associated Edison properties are designated P/U (Public/Utility) on the proposed General Plan. No portion of the subject transmission corridor is designated for either open space or recreation uses. The General Plan and Program EIR do discuss possible consultation with Edison to determine whether and under what circumstances pedestrian/hiking/equestrian/bike trails within these corridors might be possible. However, the language is explicit with regard to exploring these possibilities and is not prescriptive nor could be.

It is correct that the referenced transmission corridor is not specifically designated for utility uses. However, the proposed General Plan does recognize that transmission corridors are essential facilities and indicates that only uses compatible with and other than their primary function as electrical transmission corridors would be permitted. Of course, it is understood that Edison's ownership of these corridors or easements requires that Edison approve any alternative use, compatible or otherwise within these corridors.

J. DESERT WATER AGENCY

J.-1. Comment: The Desert Water Agency would like the EIR modified to reflect a more accurate depiction of this Agency's relationship with the Mission Springs Water District (MSWD) and the management of the Mission Creek Subbasin.

The City of Desert Hot Springs is currently provided service and ample water for normal use and fire protection by the Mission Springs Water District. However, the report overlooks the fact that the majority of MSWD's service area is encompassed by the geographical boundaries of the Desert Water Agency (DWA). These boundaries were established by an act of State legislation in 1961, and provided the authority for this Agency to contract for the importation of water from the State Water Project. As of this date, the Desert Water Agency and the Coachella Valley Water District (CVWD) are the only authorized State Water Project contractors within the Coachella Valley. All references to Mission Springs Water District contracting for State Water Project resources is incorrect and should be eliminated from the EIR.

J.-1. Response: Comment noted and hereby incorporated by reference in the Program EIR and General Plan.

J.-.2. Comment: Through an agreement with the Metropolitan Water District (MWD), DWA and CVWD have agreed to exchange its State Water Project entitlements for Colorado River water supplied through MSWD's Colorado River Aqueduct. Although there are not current agreements, nor are there any on-going negotiations between the Desert Water Agency and MSWD, a portion of this exchange entitlement will ultimately be utilized to facilitate the recharging of the Mission Creek Subbasin.

As this Agency has assumed the lead role in the management of this Subbasin, contract administration and all costs associated with the construction of any necessary recharge facilities will become the responsibility of this Agency and shall not involve Mission Springs Water District. Desert Water Agency will assess MSWD customers a replenishment fee to help recover the costs of the Replenishment Program.

J.-2. Response: Comment noted and hereby incorporated by reference into the General Plan and Program EIR.

K. SOUTHERN CALIFORNIA GAS COMPANY

K.-1. Comment: Thank you for the opportunity to respond to the above-referenced project. Please note that Southern California Gas Company has facilities in the area where the above named project is proposed. Gas service to the project could be provided without any significant impact on the environment. The service would be in accordance with the Company's policies and extension rules on file with the California Public Utilities Commission at the time contractual arrangements are made.

K.-1. Response: Comment noted.

K.-.2. Comment: You should be aware that this letter is not to be interpreted as a contractual commitment to serve the proposed project, but only as an informational service. The availability of natural gas service, as set forth in this letter, is based upon present conditions of gas supply and regulatory policies. As a public utility, The Southern California Gas Company is under the jurisdiction of the California Public Utilities Commission. We can also be affected by actions of federal regulatory agencies. Should these agencies take any action, which affects gas supply, or the conditions under which service is available, gas service will be provided in accordance with revised conditions.

K.-2. Response: Comment noted.

K.-3. Comment: Typical demand use for:

a. Residential(System Area Average / Use Per Meter) Yearly
Single Family 799 therms / year dwelling unit
Multi-Family 4 or less units 482 therms / year dwelling unit
Multi-Family 5 or more units 483 therms / year dwelling unit

These averages are based on total gas consumption in residential units served by Southern California Gas Company, and it should not be implied that any particular home, apartment or tract of homes will use these amounts of energy.

Commercial: Due to the fact that construction varies so widely (a glass building vs. a heavily insulated building) and there is such a wide variation in types of materials and equipment used, a typical demand figure is not available for this type of construction. Calculations would need to be made after the building has been designed.

K.-3. Response: Comment noted.

K- 4. Comment: We have Demand Side Management programs available to commercial/industrial customers to provide assistance in selecting the most effective applications of energy conservation techniques for a particular project.

K.-4. Response: Comment noted.

SECTION II

COMMENT LETTERS ON THE DRAFT ENVIRONMENTAL IMPACT REPORT

The following comment letters were received on the Draft EIR transmitted to various public agencies and interested parties. These letters include comments related to the General Plan rather that the EIR and are addressed in Section I. Comments restated in Section I are bracketed in this section and correspond to the comment numbers in Section I.

United States Department of the Interior
Fish and Wildlife Service
Ecological Services
Carlsbad Fish and Wildlife Office
2730 Loker Avenue, West
Carlsbad, CA 92008

In Reply Refer To: 1-6-00-NFTA-406

JUL 1 9 2000

Nicole S. Criste
City of Desert Hot Springs
65-950 Pierson Boulevard
Desert Hot Springs, CA 92240

Subject: Comments on the Draft EIR for the Desert Hot Springs General Plan

Dear Ms. Criste:

We have reviewed the Draft Environmental Impact Report (DEIR) for the Desert Hot Springs General Plan, received June 5, 2000, and provide the following comments and recommendations.

General Comments

The Desert Hot Springs General Plan area contains a unique assemblage of plants and wildlife, including many endemic and rare species. This General Plan update provides the City an opportunity to conserve unique species and habitats that have coevolved over thousands of years, by considering the environment as an infrastructural component, along with the more traditional planning elements, such as utilities, traffic, public health, and safety. Information available through the Coachella Valley Multi-species Plan (Multi-species Plan) and the existing Fringe-toed Lizard Habitat Conservation Plan (HCP) provide a wealth of information on the natural resource heritage of the northern Coachella Valley that enables the City to plan its future in a way that harmonizes with the conservation needs of local plants and animals. A-1

Overlays of General Plan alternatives onto an aerial image of the Desert Hot Springs area would facilitate a more effective integration of human and biological perspectives. Without aerial imagery, it is difficult to discern how the proposed zoning relates to topographical features and areas of biological concern.

Specific Comments

Coachella Valley Fringe-toed Lizard Habitat Conservation Plan

In evaluating whether the HCP is functioning as originally intended, it has become apparent that in light of more recent information, the HCP underestimated the importance of Mission and Morongo washes to the long-term maintenance of the Willow Hole/Edom Hill Reserve. The sand A - 2

transport process along Big Morongo and Mission Creeks entails natural flooding and stream braiding across the floodplain, which fluvially disturbs armored surfaces and exposes subsurface sediments to strong winds and aeolian transport to the Willow Hole/Edom Hill Reserve (Reserve) (Lancaster *et al.* 1993). Aerial photography from 1960 (Proctor 1968) and 1991 (FWS, file info.) clearly reveal substantial blowsand transport from Mission Creek to the Willow Hole area. In addition, the sand transport corridor for the Willow Hole/Edom Hill Reserve has been recognized by the Scientific Advisory Committee for the Multi-species Plan as the area bounded by 20th Avenue, Varner Road, Mission Wash and the western Reserve boundary along Mountain View Drive. The current and proposed zoning of the sand transport corridor for light industrial, residential estates (2.5 du/ac), and low density residential (0-5 du/ac) is not compatible with maintaining sand transport processes to the Reserve. Industry would effectively block the wind and sand with large structures, and residential development would shield sand transport due to the residences, and associated windbreaks, landscaping, and fences. A - 2

Sand deprivation, resulting from development of the sand transport corridor, would lead to long-term erosion by the prevailing westerly winds to the extent that sandy substrates would be eliminated over time downwind of the terminus of Mission and Morongo Washes (between the San Andreas Fault and Interstate 10). This effect would compromise the ability of the Willow Hole-Edom Hill Reserve to function over the long-term as suitable habitat for the fringe-toed lizard. Loss of blowsand within the Reserve and surrounding areas would cause a significant reduction in the distribution, numbers, and reproduction of the Coachella Valley fringe-toed lizard.

In Section III(F)(3) of the DEIR, mitigation measure (O) states that the City should conscientiously work to preserve blowsand habitat near, within and tributary to the Willow Hole-Edom Hill Reserve, and should support efforts to preserve essential sand sources for the Reserve. This measure implies that appropriate zoning and land uses would be adopted to maintain sand transport processes, even though the actual zoning proposed conflicts with this measure. The EIR should resolve this inconsistency. Consequently, we recommend a hydrological study be conducted to determine how much of the 100-year floodplain for Mission and Morongo Creeks is necessary to maintain the sand source for the Reserve. Unless this hydrological study indicates otherwise, the 100-year floodplain for Mission and Morongo Creeks should be zoned Open Space/Flood Ways (OS/FW) and remain undeveloped. A - 3

Multi-species Plan

The General Plan area supports suitable habitat for the following rare species proposed for inclusion in the Multi-species Plan: federally endangered Coachella Valley milk-vetch (*Astragalus lentiginosus* var. *coachellae*), Little San Bernardino Mountains gilia (*Gilia maculata*), flat-tailed horned lizard (*Phrynosoma mcallii*), Palm Springs ground squirrel (*Spermophilus teriticaudus chlorus*), Palm Springs pocket mouse (*Perognathus longimembris bangsi*), LeConte's thrasher (*Toxostoma lecontei*), burrowing owl (*Speotyto cunicularia*), and the Coachella giant sand treader cricket (*Macrobaenetes valgum*). The Multi-species Plan likely will propose conservation A - 4

of the 100-year floodplain for Mission and Morongo washes and the sand transport corridor mentioned above. Various Multi-species Plan alternatives also propose upper portions of Mission and Morongo Creeks as essential core habitat, as well as the sand transport corridor for the Reserve, between 20th Avenue and Varner Road, as an essential ecological process area. The proposed zoning in the DEIR for the 100-year floodplain and sand transport corridor as described above, would potentially preclude conservation coverage for some of these species in the Multi-species Plan because of significant, unmitigated effects. If developed according to the zoning proposed in the DEIR, the sand transport system for the Willow Hole-Edom Hill Reserve would be compromised, as well as species that inhabit the Reserve and sand transport corridor. A - 4

CEQA

The Palm Springs pocket mouse is a narrow endemic species that only occurs in the Coachella Valley on loosely packed or sandy soils. The vicinity of T2S, R4E, Section 21 that is designated as 100-year floodplain, supports a high abundance of Palm Springs pocket mouse (*Perognathus longimembris bangsi*) according to studies conducted for the Coachella Valley Multi-species Habitat Conservation Plan (Dodd 1999). Areas south of these sections, with similar sandy habitat (denoted as alluvial fan and active channel deposits on the geology map in the DEIR), likely support similar abundances of Palm Springs pocket mouse, given comparable habitat quality (Shana Dodd, pers. comm.). A - 5

Little San Bernardino Mountains gilia is restricted to areas of the Little San Bernardino Mountains around Desert Hot Springs and at the northern edge of Joshua Tree National Park. Adjacent areas in and around Section 22 support a large population of Little San Bernardino Mountains gilia. The majority of known locations of Little San Bernardino Mountains gilia in the Coachella Valley are in and around the Mission and Morongo washes in the vicinity of Highway 62. The known locations within the Coachella Valley are on the margins of washes on shallow sandy benches, commonly found within the 100-year floodplain for Mission and Morongo Creeks. The draft Multi-species Plan describes the greatest threat to this species as "...growing urbanization in the vicinity of Desert Hot Springs and Highway 62 where the largest populations exist." The DEIR identified that the zoning in the General Plan (p. III-87) "...could constitute a significant impact to species with extremely limited distribution, such as the Coachella Valley milk-vetch, Little San Bernardino Mountains gilia, and California ditaxis." Clearly, the proposed zoning in the General Plan would significantly impact Little San Bernardino Mountains gilia, due to the virtual destruction of the largest known population in the Coachella Valley. A - 6

If the 100-year floodplain for Mission and Morongo Creeks is developed as proposed in the General Plan, not only would the Palm Springs pocket mouse and Little San Bernardino Mountains gilia populations be virtually eliminated, but the movement corridor for the pocket mouse from the upper portions of Mission and Morongo Creeks down to the Willow Hole area also would be eliminated. These species are considered Species of Special Concern by the California Department of Fish and Game. Developing some of the highest density habitat of Palm springs pocket mice and Little San Bernardino Mountains gilia known in the Valley, requires that A - 7

the significant impacts be identified and mitigated to a level of insignificance. The DEIR lacked substantial discussion on the significant loss of Palm Springs pocket mice and Little San Bernardino Mountains gilia and associated mitigation measures. **A - 7**

Section 15380 of the California Environmental Quality Act (CEQA) requires the lead agency to treat sensitive species as though they were listed, if the species meets the criteria for listing under State or Federal statutes, or that described in Section 15380(b). The proposed zoning in the General Plan would significantly impact several rare species as discussed above. These species are proposed for conservation in the Multi-species Plan to avoid additional mitigation consequent to potential listing. CEQA requires that EIRs identify and focus on the significant environmental effects of proposed projects and analyze feasible measures to avoid or substantially reduce the project's significant environmental effect [Section 15126.4(a)]. The restricted distribution, declining trends, and assumed listed status in the Multi-species Plan, indicates that these species should be treated in the EIR as though they are listed, with appropriate avoidance, mitigation and compensation proposed for significant impacts. **A - 8**

The significant unmitigated effects of the General Plan update indicate that substantially greater consideration of biological consequences needs to be incorporated into the General Plan and CEQA planning processes. We, therefore, recommend the City defer consideration of the General Plan update until the Multi-species Plan is approved, to ensure that the planning processes compliment each other. **A - 9**

We appreciate the opportunity to comment on the DEIR for the Desert Hot Springs General Plan. If you have any questions regarding this letter, please contact Matt McDonald of my staff at (760) 431-9440.

Sincerely,

for Nancy Gilbert
Assistant Field Supervisor

cc: John Criste, Terra Nova
Kim Nicol, CDFG

Literature Cited

Dodd, S. C: 1999. Report of the 1999 Palm Springs pocket mouse (*Perognathus longimembris bangsi*) surveys. Unpublished Report.

Lancaster, N., J. R. Miller, and L. Zonge. 1993. Geomorphic evolution and sediment transport dynamics of eolian terrains in the Coachella Valley Preserve System, South-Central California. Unpublished Report.

Proctor, R. J. 1968. Geology of the Desert Hot Springs-Upper Coachella Valley area, California. California Division of Mines and Geology, Special Report 94.

State of California **The Resources Agency**

MEMORANDUM

To: Project Coordinator
Resources Agency

Date: July 17, 2000

Mr. John D. Criste, AICP, City Planner
Desert Hot Springs
65950 Pierson Boulevard
Desert Hot Springs, CA 92240

From: **Department of Conservation**
Office of Governmental and Environmental Relations

Subject: Draft Environmental Impact Report (DEIR) on the City of Desert Hot Springs General Plan – **SCH #2000021006**

The Department of Conservation's Divisions of Oil, Gas, and Geothermal Resources (DOGGR) and Mines and Geology (DMG) have reviewed the DEIR for the referenced project. The DOGGR supervises the drilling, maintenance, and plugging and abandonment of oil, gas, and geothermal wells. The DMG maps and reports on significant mineral resource deposits, and provides information to support land use decisions that conserve these resource deposits. We offer the following comments on the DEIR.

Geothermal Resources

On page II-8 of the document, under Geothermal Resources, the Desert Hot Springs Sub-basin is mentioned as the primary source for geothermal waters in the City and its sphere-of-influence. In addition, the Division has delineated a geothermal field within this sub-basin. Enclosed are two maps. The larger map outlines the geothermal field and its isothermal contours and the smaller map outlines the geothermal field as it relates to development. We recommend that you confer with Mr. Timothy S. Boardman in the DOGGR district office in El Centro for questions or technical assistance. He may be reached at 485 Broadway, Suite B, El Centro, CA 92243; or, phone (619) 353-9900. **B-1**

Mineral (Aggregate) Resources

Important aggregate resource deposits exist in the Desert Hot Springs planning area. Specifically, part of Sector C (NW1/4 Section 24, T2S, R4E) occurs in the planning area. Sector C is an area designated by the State Mining and Geology Board (SMGB) as an area of regional significance for aggregate resources. Although these resources occur in a relatively small portion of the planning area, they should be acknowledged and described in the final EIR. Project impacts on the continued **B-2**

availability of these resources should be discussed and mitigated in the final EIR. These impacts analyzed should include both direct and indirect (i.e., adjacent incompatible land uses) effects of the project. In discussing project impacts, the final EIR should discuss the loss of the resource in terms of projected regional demand and supply for aggregate. **B-2**

The State Mining and Geology Board has designated other sectors (for aggregate resources) just outside and to the south of the planning area that could pose future land use conflicts with urban uses if the deposits were to be developed for aggregate resources. The final EIR should examine the proposed general plan in light of these potential impacts. **B-3**

If you have questions about the mineral resources of the planning area, please contact Mr. Robert L. Hill, DMG Senior Geologist, at 801 K Street, MS 8-38, Sacramento, CA 95814; or, phone (916) 327-0791.

Thank you for the opportunity to comment on the DEIR. In addition to the contacts listed above, please feel free to call me at (916) 445-8733.

for Jason Marshall
Assistant Director

Attachments

cc: Timothy S. Boardman
Department of Conservation
Division of Oil, Gas, and Geothermal Resources, El Centro
Linda Campion
Department of Conservation
Division of Oil, Gas, and Geothermal Resources, Sacramento
Robert L. Hill, Senior Geologist
Department of Conservation
Division of Mines and Geology

References

Department of Conservation, Division of Mines and Geology, in cooperation with the SMGB, Designation Report Number 10, December 1989, Designation of Regionally Significant Construction Aggregate Resources in the Palm Springs Production-Consumption Region.

Department of Conservation, Division of Mines and Geology, Special Report 159, 1987, Mineral Land Classification: Aggregate Materials in the Palm Springs Production-Consumption Region.

South Coast
Air Quality Management District
21865 E. Copley Drive, Diamond Bar, CA 91765-4182
(909) 396-2000 · http://www.aqmd.gov

FAXED: JULY 14, 2000

July 14, 2000

Ms. Nicole S. Criste
Community Development Director
City of Desert Hot Springs
65-950 Pierson Boulevard
Desert Hot Springs, CA 92240

Draft Environmental Impact Report (DEIR) for the Desert Hot Springs Comprehensive General Plan (SCH No. 2000021006)

Dear Ms. Criste:

The South Coast Air Quality Management District (AQMD) appreciates the opportunity to comment on the above-mentioned document. The following comments are meant as guidance for the Lead Agency and should be incorporated in the Final Environmental Impact Report.

Pursuant to Public Resources Code Section 21092.5, please provide the AQMD with written responses to all comments contained herein prior to the certification of the Final Environmental Impact Report. The AQMD would be happy to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Dr. Charles Blankson, Transportation Specialist – CEQA Section, at (909) 396-3304 if you have any questions regarding these comments.

Sincerely

Steve Smith

Steve Smith, Ph.D.
Program Supervisor, CEQA Section
Planning, Rule Development & Area Sources

Attachment

SS:CB

RVC000606 03
Control Number

59

Draft Environmental Impact Report (DEIR) for the Desert Hot Springs Comprehensive General Plan

1. Construction Emissions: Table III-18 on page III-105 of the DEIR gives estimates of fugitive dust emissions expected to be generated from site disturbance, grading and building on the 22,485 acres of the city General Plan area. The table does not, however, give any estimates of the other equally important air pollutant emissions that will be generated by the use of different types of construction equipment and vehicles during construction. Construction equipment and vehicles generate emissions such as carbon monoxide (CO), nitrogen oxides (NO_X) and volatile organic compounds (VOC) during construction. Given the distribution of the proposed land uses in Tables I-1 and I-2 of the DEIR, it should be possible to estimate the other air pollutant emissions using the assumptions and methodologies provided in the 1993 SCAQMD CEQA Air Quality Handbook (Handbook). It is suggested that an attempt at quantification of these pollutants be made in the Final EIR. This will enable staff and the public to properly assess the magnitude of the other air pollutant emissions. **C-1**

2. Emission Factors: According to the footnotes in Table III—25, and to some extent in Table III-26, the emission factors used in estimating emissions from vehicle trips were taken from the Table A9-5 series in the Handbook. Please note that the emission factors used in the A9-5 series were derived from an older and obsolete version of the California Air Resources Board's (CARB) mobile source emission factors inventory, EMFAC7EP. The ARB has produced more recent and updated emission factors in EMFAC2000. Current emission factors have been demonstrated to be generally higher than those used in EMFAC7EP. The AQMD recommends that the lead agency use the current emission factors to recalculate the motor vehicle emissions to reflect the most accurate data currently available. The EMFAC2000 emission factors can be obtained from the ARB web page at www.arb.ca.gov. **C-2**

3. Rule 2202 – On-Road Motor Vehicle Mitigation Options: It is stated on page 2-18 of Appendix E that Regulation XV (Rule 1501) is one of the SCAQMD rules that the City of Desert Hot Springs is subject to. Please note that Regulation XV or Rule 1501 has been replaced by Rule 2202 – On-Road Motor Vehicle Mitigation Options, since December 1995. Rule 2202 currently applies to employees or employer sites with 250 or more employees. Please revise this section in the Final EIR. **C - 3**

4. Project Consistency: The DEIR does not address the issue of project consistency with the regional and local air quality plans. Both CEQA and the California planning, zoning and development laws require projects to be consistent with the jurisdiction's air quality goals and objectives. Please correct this omission in the Final EIR. **C - 4**

Riverside County
Waste Management Department
Robert A. Nelson, General Manager-Chief Engineer

July 17, 2000

Nicole S. Criste
City of Desert Hot Springs
65-950 Pierson Boulevard
Desert Hot Springs, CA 92240

RE: Draft Environmental Impact Report for Desert Hot Springs Comprehensive General Plan

Dear Ms. Criste:

The Riverside County Waste Management Department (Department) has reviewed the Draft Environmental Impact Report (DEIR) for the Desert Hot Springs Comprehensive General Plan and has the following comments:

1. The following landfill information updates data included in the DEIR:

   El Sobrante Landfill: As of July 1, 2000, the landfill had an overall remaining disposal capacity of approximately 3,022,982 tons. During the June 1, 1999 through May 31, 2000 period, the landfill received an average of 3,053 tons per day of waste (1,744 tons per day/in-County, 1,309 tons/out-of-County).

   Lamb Canyon Landfill: As of July 1, 2000, the landfill had a remaining disposal capacity of approximately 5,647,887 tons. During the June 1, 1999 through May 31, 2000 period, the landfill received an average of 490 tons per day. The Lamb Canyon Landfill also operates as a long-term disposal site. **D-1**

   Badlands Landfill: As of July 1, 2000, the landfill had an overall remaining disposal capacity of approximately 11,037,297 tons. During the June 1, 1999 through May 31, 2000 period, the landfill received an average 1,425 tons per day.

   Edom Hill Landfill: As of July 1, 2000, the landfill had an overall remaining capacity of 1,643,097 tons. During the June 1, 1999 through May 31, 2000 period, the landfill received an average 1,261 tons per day.

2. The Coachella Transfer Station opened on July 3, 2000. Please be advised that the City of Cathedral City is in the process of considering several waste-related projects, including a transfer waste facility. **D-2**

3. The impacts discussion does not include project estimates of construction and green waste resulting from the project. The Department encourages the implementation of the mitigation measures listed in the document, which address construction/green waste components of the waste stream. **D-3**

1995 Market Street • Riverside, CA 92501-1719 • (909) 955-1370 • Fax (909) 955-1374 • Fax (909) 955-1334

4. The DEIR does not indicate whether the City of Desert Hot Springs has attained the AB 939 requirement to reduce waste disposal by 50 percent beginning in the year 2000. The DEIR also does not assess whether the mitigation measures identified will achieve this standard. To promote recycling, the Department recommends the following additional measure:

   i. The California Solid Waste Reuse and Recycling Act of 1991 requires that adequate areas for collecting and loading recyclable materials be provided in public facilities, commercial projects, business areas, multi-family residential projects with five or more units and detached, single family residential projects where solid waste is collected and loaded in a location which serves five or more units.

D - 4

Thank you for the opportunity to review the DEIR. If you have any questions in regard to this letter, please do not hesitate to contact either Lesley Likins at (909) 955-4375 or myself at (909) 955-4387.

Sincerely,

Katherine M. Gifford
Planner III

KG:kg
cc: File
File: f://data/plng/landuse/eir/2000\00-04deir

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Angeles County: Yvonne Brathwaite Burke, Los Angeles County • Zev Yaroslavsky, Los Angeles nty • Eileen Ansari, Diamond Bar • Bob dett, Monrovia • Bruce Barrows, Cerritos • George Bass, Bell • Hal Bernson, Los Angeles • is Christiansen, Covina • Robert Bruesch, semead • Laura Chick, Los Angeles • Gene niels, Paramount • Jo Anne Darcy, Santa Clarita • Ferraro, Los Angeles • Michael Feuer, Los ngeles • Ruth Galanter, Los Angeles • Jackie dberg, Los Angeles • Ray Grabinski, Long Beach ee Hardison, Torrance • Mike Hernandez, Los Angeles • Nate Holden, Los Angeles • Lawrence dey, Inglewood • Keith McCarthy, Downey • dy Miscikowski, Los Angeles • Stacey Murphy, erbank • Pam O'Connor, Santa Monica • Jenny peza, Long Beach • Nick Pacheco, Los Angeles alex Padilla, Los Angeles • Bob Pinzler, Redondo ch • Beatrice Proo, Pico Rivera • Mark Ridley- mas, Los Angeles • Richard Riordan, Los Angeles • Karen Rosenthal, Claremont • Martine w, Compton • Rudy Svorinich, Los Angeles • Talbot, Alhambra • Sidney Tyler, Jr., Pasadena • el Wachs, Los Angeles • Rita Walters, Los Angeles nnis Washburn, Calabasas

Orange County: Charles Smith, Orange County • Bates, Los Alamitos • Ralph Bauer, Huntington ch • Art Brown, Buena Park • Elizabeth Cowan, sta Mesa • Jan Debay, Newport Beach • Cathryn bung, Laguna Niguel • Richard Dixon, Lake rest • Alta Duke, La Palma • Shirley McCracken, heim • Bev Perry, Brea

Riverside County: James Venable, Riverside unty • Ron Loveridge, Riverside • Greg Pettis, ehal City • Andrea Puga, Corona • Ron berts, Temecula • Charles White, Moreno Valley

Bernardino County: Kathy Davis, San nardino County • Bill Alexander, Rancho cucamonga • Jim Bagley, Twentynine Palms • David eman, Fontana • Lee Ann Garcia, Grand Terrace wenn Norton-Perry, Chino Hills • Judith Valles, Bernardino

atura County: Judy Mikels, Ventura County • una De Paola, San Buenaventura • Glen Becerra, Valley • Toni Young, Port Hueneme

Riverside County Transportation Commission: in Lowe, Hemet

Ventura County Transportation Commission: Davis, Simi Valley

June 26, 2000

Ms. Nicole S. Criste
Community Development Director
City of Desert Hot Springs
65-950 Pierson Boulevard
Desert Hot Springs, CA 92240

RE: **Comments on the Draft Environmental Impact Report for the City of Desert Hot Springs General Plan Update - SCAG No. I 20000302**

Dear Ms. Criste:

Thank you for submitting the **Draft Environmental Impact Report for the City of Desert Hot Springs General Plan** to SCAG for review and comment. As areawide clearinghouse for regionally significant projects, SCAG assists cities, counties and other agencies in reviewing projects and plans for consistency with regional plans.

The attached detailed comments are meant to provide guidance for considering the proposed project within the context of our regional goals and policies. If you have any questions regarding the attached comments, please contact Jeffrey Smith, Senior Planner, at (213) 236-1867. Thank you.

Sincerely,

J. DAVID STEIN
Manager, Performance Assessment and Implementation

63

COMMENTS ON THE
DRAFT ENVIRONMENTAL IMPACT REPORT
FOR THE
CITY OF DESERT HOT SPRINGS GENERAL PLAN UPDATE
SCAG NO. I 200002302

PROJECT DESCRIPTION

The proposed Project consists of a Comprehensive General Plan Update for the City of Desert Hot Springs, in Riverside County. The proposed Project involves the planning of 14,782 acres of incorporated lands and an additional 22,180 acres of unincorporated planning area.

INTRODUCTION TO SCAG REVIEW PROCESS

The document that provides the primary reference for SCAG's project review activity is the Regional Comprehensive Plan and Guide (RCPG). The RCPG chapters fall into three categories: core, ancillary, and bridge. The Growth Management (adopted June 1994), Regional Transportation Plan (adopted April 1998), Air Quality (adopted October 1995), Hazardous Waste Management (adopted November 1994), and Water Quality (adopted January 1995) chapters constitute the core chapters. These core chapters respond directly to federal and state planning requirements. The core chapters constitute the base on which local governments ensure consistency of their plans with applicable regional plans under CEQA. The Air Quality and Growth Management chapters contain both core and ancillary policies, which are differentiated in the comment portion of this letter. The Regional Transportation Plan (RTP) constitutes the region's Transportation Plan. The RTP policies are incorporated into the RCPG.

Ancillary chapters are those on the Economy, Housing, Human Resources and Services, Finance, Open Space and Conservation, Water Resources, Energy, and Integrated Solid Waste Management. These chapters address important issues facing the region and may reflect other regional plans. Ancillary chapters, however, do not contain actions or policies required of local government. Hence, they are entirely advisory and establish no new mandates or policies for the region.

Bridge chapters include the Strategy and Implementation chapters, functioning as links between the Core and Ancillary chapters of the RCPG.

Each of the applicable policies related to the proposed project are identified by number and reproduced below in italics followed by SCAG staff comments regarding the consistency of the Project with those policies.

SUMMARY OF SCAG STAFF COMMENTS

1. The Draft EIR does not address the relationship of the proposed project to **applicable regional plans** as required by Section 15125 [d] of *Guidelines for Implementation of the California Environmental Quality Act.*

2. The Final EIR should address the relationships (consistency with core policies and support of ancillary policies) to SCAG's Regional Comprehensive Plan and Guide, utilizing commentary from the following detailed SCAG staff comments. The response should also discuss any inconsistencies between the proposed project and applicable regional plans. We suggest that you identify the specific policies, by policy number, with a discussion of consistency or support with each policy. E-1

CONSISTENCY WITH REGIONAL COMPREHENSIVE PLAN AND GUIDE POLICIES

The Growth Management Chapter (GMC) of the Regional Comprehensive Plan and Guide contains a number of policies that are particularly applicable to the City of Desert Hot Springs General Plan Update.

Core Growth Management Policies

3.01 The population, housing, and jobs forecasts, which are adopted by SCAG's Regional Council and that reflect local plans and policies, shall be used by SCAG in all phases of implementation and review. E-2

SCAG staff comments. The Draft EIR references the adopted RTP 1998 SCAG's Population, Household and Employment forecasts for the City of Desert Hot Springs on page III-167. The Project is consistent with this core RCPG policy.

3.03 The timing, financing, and location of public facilities, utility systems, and transportation systems shall be used by SCAG to implement the region's growth policies.

SCAG staff comments. The Draft EIR does not present a discussion on Project phasing and timing. It would be helpful if the Final EIR would provide a discussion and address the manner in which the Project is supportive or detracts from the achievement of this policy. Based on the information provided in the Draft EIR, we are unable to determine if the Project is consistent with this core RCPG policy. E-3

Regional Transportation Plan

The Regional Transportation Plan (RTP) also has goals, objectives, policies and actions pertinent to this proposed project. This RTP links the goal of sustaining mobility with the goals of fostering economic development, enhancing the environment, reducing energy consumption, promoting transportation-friendly development patterns, and encouraging fair and equitable access to residents affected by socio-economic, geographic and commercial limitations. Among the relevant goals, objectives, policies and actions of the RTP are the following:

Core Regional Transportation Plan Policies

4.01 *Transportation investments shall be based on SCAG's adopted Regional performance Indicators.*

SCAG staff comments. The Draft EIR does not provide a discussion on Transportation investments based on the following SCAG adopted Regional Performance Indicators:

Mobility - Transportation Systems should meet the public need for improved access, and for safe, comfortable, convenient and economical movements of people and goods.

- Average Work Trip Travel Time in Minutes – 22 minutes
- PM Peak Highway Speed – 33 mph
- Percent of PM Peak Travel in Delay (All Trips) – 33%

E - 4

Accessibility - Transportation Systems should ensure the ease with which opportunities are reached. Transportation and land use measures should be employed to ensure minimal time and cost.

- Work Opportunities within 25 Minutes – 88%

Environment - Transportation Systems should sustain development and preservation of the existing system and the environment. (All Trips)

- Meeting Federal and State Standards – Meet Air Plan Emission Budgets

Reliability - Reasonable and dependable levels of service by mode. (All Trips)

- Transit – 63%
- Highway – 76%

Safety - Transportation Systems should provide minimal, risk, accident, death and injury. (All Trips)

- Fatalities Per Million Passenger Miles – 0.008
- Injury Accidents – 0.929

Livable Communities - Transportation Systems should facilitate Livable Communities in which all residents have access to all opportunities with minimal travel time. (All Trips)

- Vehicle Trip Reduction – 1.5%
- Vehicle Miles Traveled Reduction – 10.0%

Equity - The benefits of transportation investments should be equitably distributed among all ethnic, age and income groups. (All trips) E - 4

- Low-Income (Household Income $12,000)) Share of Net Benefits – Equitable Distribution of Benefits

Cost-Effectiveness - Maximize return on transportation investment. (All Trips)

- Net Present Value – Maximum Return on Transportation Investment
- Value of a Dollar Invested -- Maximum Return on Transportation Investment

The Final EIR should address the manner in which the Project is supportive of or detracts from the achievement of the eight core RTP objectives. Based on the information provided, we are unable to determine whether the Project is consistent with this core RCPG policy.

4.02 *Transportation investments shall mitigate environmental impacts to an acceptable level.*

SCAG staff comments. The Draft EIR in Section III-B (Traffic/Circulation) identifies transportation and circulation impacts, and details the measures to mitigate these impacts on pages III-33 through III-38. The Project is consistent with this core RCPG policy. E - 5

4.04 *Transportation Control Measures shall be a priority.*

SCAG staff comments. The Draft EIR includes mitigation measures that support the implementation of Transportation Control Measures. Mitigation Measure M, in Section III-H (Air Quality), encourages the implementation of telecommuter programs to reduce traffic. The Project is consistent with this core RCPG policy. E - 6

4.16 *Maintaining and operating the existing transportation system will be a priority over expanding capacity* E – 7

SCAG staff comments. The Draft EIR, on page III-36, discusses circulation system upgrades, which should maintain and operate the existing transportation system. The Project is consistent with this core RTP policy. E - 7

GMC POLICIES RELATED TO THE RCPG GOAL TO IMPROVE REGIONAL STANDARD OF LIVING

The Growth Management goals to develop urban forms that enable individuals to spend less income on housing cost, that minimize public and private development costs, and that enable firms to be competitive, strengthen the regional strategic goal to stimulate the regional economy. The evaluation of the proposed project in relation to the following policies would be intended to guide efforts toward achievement of such goals and does not infer regional interference with local land use powers

3.04 *Encourage local jurisdictions' efforts to achieve a balance between the types of jobs they seek to attract and housing prices.* E - 8

SCAG staff comments. The Draft EIR does not include a discussion on jobs and housing balance. It would be helpful if the Final EIR would provide a discussion and address the manner in which the Project is supportive or detracts from the achievement of this policy. Based on the information provided in the Draft EIR, we are unable to determine if the Project is supportive of this ancillary RCPG policy.

3.05 *Encourage patterns of urban development and land use, which reduce costs on infrastructure construction and make better use of existing facilities.*

SCAG staff comments. The Draft EIR in Sections III-B (Traffic/Circulation) and III-K (Public Services and Facilities) acknowledges that the Project will maximize the use of existing infrastructure and improve infrastructure deficiencies to meet the needs of the proposed Project. Mitigation measures outlined in each section will address identified impacts. The Project is supportive of this ancillary RCPG policy. E - 9

3.08 *Encourage subregions to define economic strategy to maintain economic viability of the subregion, including the development and use of marketing programs, and other economic incentives, which support the attainment of subregional goals and policies.* E - 10

SCAG staff comments. The Draft EIR in Section III-K (Socio-Economic Resources) includes a number of mitigation measures that focus on improving the economic base of the City of Desert Hot Springs. The Project is supportive of this ancillary RCPG policy.

3.09 *Support local jurisdictions' efforts to minimize the cost of infrastructure and public service delivery, and efforts to seek new sources of funding for development and the provision of services.* E - 11

SCAG staff comments. See SCAG comments on policy 3.05. The Project is supportive of this ancillary RCPG policy.

3.10 *Support local jurisdictions' actions to minimize red tape and expedite the permitting process to maintain economic vitality and competitiveness.*

SCAG staff comments. The Draft EIR only addresses subjects that may have adverse environmental impacts. It is written in a concise manner, where all possible adverse impacts are mitigated this will help minimize red tape, and help maintain the economic vitality and competitiveness of the City of Desert Hot Springs. In addition, the Draft EIR, on pages III-15 and III-174 includes mitigation measures, which will also help to minimize red tape, and help maintain the economic vitality and competitiveness of the City of Desert Hot Springs. The Project is supportive of this ancillary RCPG policy. E - 12

GMC POLICIES RELATED TO THE RCPG GOAL TO IMPRPVE THE REGIONAL QUALITY OF LIFE

The Growth Management goals to attain mobility and clean air goals and to develop urban forms that enhance quality of life, that accommodate a diversity of life styles, that preserve open space and natural resources, and that are aesthetically pleasing and preserve the character of communities, enhance the regional strategic goal of maintaining the regional quality of life. The evaluation of the proposed project in relation to the following policies would be intended to provide direction for plan implementation, and does not allude to regional mandates.

E - 13

3.11 *Support provisions and incentives created by local jurisdictions to attract housing growth in job rich subregions and job growth in housing subregions.*

SCAG staff comments. See SCAG staff comment on policy 3.04. It would be helpful if the Final EIR would provide a discussion and address the manner in which the Project is supportive or detracts from the achievement of this policy. Based on the information provided in the Draft EIR, we are unable to determine if the Project is supportive of this ancillary RCPG policy.

3.12 *Encourage existing or proposed local jurisdictions' programs aimed at designing* E - 14

land uses which encourage the use of transit and thus reduce the need for roadway expansion, reduce the number of auto trips and vehicle miles traveled, and create opportunities for residents to walk and bike.

E -1

SCAG staff comments. The Draft EIR in Section III-B (Traffic/Circulation) includes mitigation measures that encourage the coordination and implementation of transit and transit facilities, and bikeways, pedestrian and/or equestrian trails. The Project is supportive of this ancillary RCPG policy.

3.13 *Encourage local jurisdictions' plans that maximize the use of existing urbanized areas accessible to transit through infill and redevelopment.*

E - 1

SCAG staff comments. While the Draft EIR does not directly address the subject of transit service to serve and provide access to new development and redeveloped areas, mitigation measure "I" on page III-38 advocates the, "...continued coordination with the Sunline Transit Agency to establish transit stops...". The Project is supportive of this ancillary RCPG policy.

3.14 *Support local plans to increase density of future development located at strategic points along the regional commuter rail, transit systems, and activity centers.*

E - 1

SCAG staff comments. See SCAG staff comments on policies 3.12 and 3.13. The project is supportive of this ancillary RCPG policy.

3.15 *Support local jurisdictions' strategies to establish mixed-use clusters and other transit-oriented developments around transit stations and along transit corridors.*

E - 1

SCAG staff comments. See SCAG staff comments on policy 3.14. The Project is supportive of this ancillary RCPG policy.

3.16 *Encourage developments in and around activity centers, transportation corridors, underutilized infrastructure systems, and areas needing recycling and redevelopment.*

E - 1

SCAG staff comments. See SCAG staff comments on policy 3.14. The Project is supportive of this ancillary RCPG policy.

3.17 *Support and encourage settlement patterns, which contain a range of urban densities.*

E - 1

SCAG staff comments. The Draft EIR in Section III-A (Land Use and Compatibility) identifies ranges of urban densities. The Project is supportive of this

ancillary RCPG policy. E - 19

3.18 *Encourage planned development in locations least likely to cause adverse environmental impact.*

SCAG staff comments. The Project is proposed in a manner, which will minimize adverse environmental impacts. Mitigation measures included in the Draft EIR have been developed to address identified impacts. The City of Desert Hot Springs should carefully consider the adequacy of these measures. The Project is supportive of this ancillary RCPG policy. E - 20

3.19 *SCAG shall support policies and actions that preserve open space areas identified in local, state, and federal plans.*

SCAG staff comments. The Draft EIR, on page III-14, states, "The Plan provides for the protection of special, valuable or sensitive resource areas through the application of Open Space land use designations..." The Project is supportive of this ancillary RCPG policy. E - 21

3.20 *Support the protection of vital resources such as wetlands, groundwater recharge areas, woodlands, production lands, and land containing unique and endangered plants and animals.*

SCAG staff comments. The Draft EIR in Section III-F (Biological Resources) acknowledges that development facilitated by implementation of the proposed Project will result in direct and indirect impacts to certain plant and animal species. Mitigation measures outlined in this Section have been developed to address identified impacts. The City of San Desert Hot Springs should carefully consider the adequacy of these measures. The Project is supportive of this ancillary RCPG policy. E - 22

3.21 *Encourage the implementation of measures aimed at the preservation and protection of recorded and unrecorded cultural resources and archaeological sites.*

SCAG staff comments. The Draft Program EIR in Section III-G (Cultural Resources) acknowledges that the proposed Project could potentially result in direct and/or indirect disturbance or destruction of sensitive historic and archaeological resources. Mitigation measures included in this Section developed to address identified impacts. The City of Desert Hot Springs should carefully consider the adequacy of these measures. The Project is supportive of this ancillary RCPG policy. E -23

3.22 *Discourage development, or encourage the use of special design requirements, in areas with steep slopes, high fire, flood, and seismic hazards.*

SCAG staff comments. The Draft EIR in Sections III-C (Soils/Geology) and III-D (Hydrology) identifies potential impacts related to seismicicity, liquefaction, soils, slope instability, existing and proposed stormwater facilities and the Willow Hole Preserve. Mitigation measures outlined in these Sections have been developed to address the identified impacts through the implementation of development codes and specific requirements. The Project is supportive of this ancillary RCPG policy. **E - 24**

3.23 *Encourage mitigation measures that reduce noise in certain locations, measures aimed at preservation of biological and ecological resources, measures that would reduce exposure to seismic hazards, minimize earthquake damage, and to develop emergency response and recovery plans*

SCAG staff comments. See SCAG staff comments on policies 3.18, 3.20, 3.21 and 3.22. The Draft EIR in Section III-I (Noise) acknowledges potential noise impacts related to traffic, stationary noise sources and construction activities. Mitigation measures included in this Section have been developed to address identified impacts. The City of Desert Hot Springs should carefully consider the adequacy of these measures. The Project is supportive of this ancillary RCPG policy. **E - 25**

GMC POLICIES RELATED TO THE RCPG GOAL TO PROVIDE SOCIAL, POLITICAL, AND CULTURAL EQUITY

The Growth Management Goal to develop urban forms that avoid economic and social polarization promotes the regional strategic goal of minimizing social and geographic disparities and of reaching equity among all segments of society. The evaluation of the proposed project in relation to the policy stated below is intended guide direction for the accomplishment of this goal, and does not infer regional mandates and interference with local land use powers.

3.24 *Encourage efforts of local jurisdictions in the implementation of programs that increase the supply and quality of housing and provide affordable housing as evaluated in the Regional Housing Needs Assessment.* **E - 26**

SCAG staff comments. The Draft EIR, in Section III-A (Land Use Compatibility) provides a discussion on Residential Land Uses. The discussion suggests that there is the potential for an additional 63,889 dwelling units at buildout. The Draft

EIR, however, does not provide a discussion on programs that could increase the supply and quality of housing and the provision of affordable housing. It would be helpful if the Final EIR would provide a discussion and address the manner in which the Project is supportive or detracts from the achievement of this policy. Based on the information provided in the Draft EIR, we are unable to determine if the Project is supportive of this ancillary RCPG policy. E - 2

3.27 *Support local jurisdictions and other service providers in their efforts to develop sustainable communities and provide, equally to all members of society, accessible and effective services such as: public education, housing, health care, social services, recreational facilities, law enforcement, and fire protection.*

SCAG staff comments. The Draft EIR, in Section III-K (Public Services and Facilities) acknowledges that the potential build out of the General Plan could result in impacts to services and facilities. Mitigation measures outlined in this Section address identified impacts. The City of Desert Hot Springs should carefully consider the adequacy of these measures. The Project is supportive of this ancillary RCPG policy. E - 2

AIR QUALITY CHAPTER CORE ACTIONS

The Air Quality Chapter (AQC) core actions that are generally applicable to the Project are as follows:

5.07 *Determine specific programs and associated actions needed (e.g., indirect source rules, enhanced use of telecommunications, provision of community based shuttle services, provision of demand management based programs, or vehicle-miles-traveled/emission fees) so that options to command and control regulations can be assessed.*

SCAG staff comments. The Draft EIR, in Section III-H (Air Quality), includes mitigation measures that encourages developers to implement demand management programs, the coordination of mass transit services, and encourage the use of alternative, clean energy sources for transportation. The Project is consistent with this core RCPG policy. E - 2

5.11 *Through the environmental document review process, ensure that plans at all levels of government (regional, air basin, county, subregional and local) consider air quality, land use, transportation and economic relationships to ensure consistency and minimize conflicts.* E - 29

SCAG staff comments. The Draft EIR, in Section III-H (Air Quality) discusses the consistency of the proposed Project with regional and local air quality policies and includes mitigation measures for impacts to air quality. The Project is consistent with this core RCPG policy. E - 2

WATER QUALITY CHAPTER RECOMMENDATIONS AND POLICY OPTIONS

The Water Quality Chapter core recommendations and policy options relate to the two water quality goals: to restore and maintain the chemical, physical and biological integrity of the nation's water; and, to achieve and maintain water quality objectives that are necessary to protect all beneficial uses of all waters.

11.06 Clean up the contamination in the region's major groundwater aquifers since its water supply is critical to the long-term economic and environmental health of the region. The financing of such clean-ups should leverage state and federal resources and minimize significant impacts on the local economy. E - 3

SCAG staff comments. The Draft EIR in Section III-E (Water Resources/Quality) discusses the subject of groundwater. Mitigation measures A and C on page III-78 have been developed to address impacts to groundwater resources. The Project is supportive of this core RCPG policy.

11.07 Encourage water reclamation throughout the region where it is cost-effective, feasible, and appropriate to reduce reliance on imported water and wastewater discharges. Current administrative impediments to increased use of wastewater should be addressed. E - 3

SCAG staff comments. The Draft EIR does not address the subject of water reclamation. It would be helpful if the Final EIR would provide a discussion and address the manner in which the Project is supportive or detracts from the achievement of this policy. Based on the information provided in the Draft EIR, we are unable to determine if the Project is supportive of this core RCPG policy.

OPEN SPACE CHAPTER ANCILLARY GOALS

Outdoor Recreation

9.01 Provide adequate land resources to meet the outdoor recreation needs of the present and future residents in the region and to promote tourism in the region. E - 3

SCAG staff comments. The Draft EIR in Section III-A (Land Use Compatibility) suggests that the City of Desert Hot Springs have adequate land resources to meet outdoor recreation needs. The project is supportive of this ancillary RCPG goal. E - 3

9.02 *Increase the accessibility to open space lands for outdoor recreation.*

SCAG staff comments. See SCAG staff comments for goal 9.01. The Project is supportive of this ancillary RCPG goal. E - 3

9.03 *Promote self-sustaining regional recreation resources and facilities.*

SCAG staff comments. See SCAG staff comments for goal 9.01. The Project is supportive of this ancillary RCPG goal. E - 34

Public Health and Safety

9.04 *Maintain open space for adequate protection of lives and properties against natural and man-made hazards.*

SCAG staff comments. The Draft EIR does not discuss the subject of maintenance of open space for adequate protection of lives and properties against natural and man-made hazards. It would be helpful if the Final EIR would provide a discussion and address the manner in which the Project is supportive or detracts from the achievement of this policy. Based on the information provided in the Draft EIR, we are unable to determine if the Project is supportive of this ancillary RCPG goal. E - 3

9.05 *Minimize potentially hazardous developments in hillsides, canyons, areas susceptible to flooding, earthquakes, wildfire and other known hazards, and areas with limited access for emergency equipment.*

SCAG staff comments. The Draft EIR does not discuss the subject of potentially hazardous developments, and areas with limited access for emergency equipment. It would be helpful if the Final EIR would provide a discussion and address the manner in which the Project is supportive or detracts from the achievement of this policy. Based on the information provided in the Draft EIR, we are unable to determine if the Project is supportive of this ancillary RCPG goal. E - 3

9.06 *Minimize public expenditure for infrastructure and facilities to support urban type uses in areas where public health and safety could not be guaranteed.* E - 3

SCAG staff comments. The Draft EIR does not discuss the subject of public expenditures for infrastructure and facilities. It would be helpful if the Final EIR would provide a discussion and address the manner in which the Project is supportive or detracts from the achievement of this policy. Based on the information provided in the Draft EIR, we are unable to determine if the Project is supportive of this ancillary RCPG goal. E - 3

Resource Protection

9.08 Develop well-managed viable ecosystems for known habitats of rare, threatened and endangered species, including wetlands.

SCAG staff comments. The Draft EIR, in Section III-I (Biological Resources), includes mitigation measures that support fee payments and the development of a habitat conservation plan for multiple wildlife species. E -38

CONCLUSIONS

1. As noted in the staff comments, the Draft Environmental Impact Report for the City of Desert Hot Springs General Plan is consistent with or supports many of the core and ancillary policies in the Regional Comprehensive Plan and Guide.

   Based on the information in the Draft Environmental Impact Report, we are unable to determine whether the Project is consistent with core policies 3.03, 4.01 and 11.07. Based on the information in the Draft Environmental Impact Report, we are unable to determine whether the Project is supportive of ancillary policies 3.04, 3.11, 3.24, 9.04, 9.05 and 9.06.

2. As noted in the Summary of SCAG Staff Comments, the Final Program EIR should address the relationships (consistency with core policies and support of ancillary policies) to SCAG's Regional Comprehensive Plan and Guide and discuss any inconsistencies between the proposed project and applicable regional plans. E - 39

3. All mitigation measures associated with the project should be monitored in accordance with CEQA requirements. E - 40

ENDNOTE

SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS

Roles and Authorities

SCAG is a ***Joint Powers Agency*** established under California Government Code Section 6502 et seq. Under federal and state law, SCAG is designated as a Council of Governments (COG), a Regional Transportation Planning Agency (RTPA), and a Metropolitan Planning Organization (MPO). SCAG's mandated roles and responsibilities include the following:

SCAG is designated by the federal government as the Region's ***Metropolitan Planning Organization*** and mandated to maintain a continuing, cooperative, and comprehensive transportation planning process resulting in a Regional Transportation Plan and a Regional Transportation Improvement Program pursuant to 23 U.S.C. □134(g)-(h), 49 U.S.C. □1607(f)-(g) et seq., 23 C.F.R. □450, and 49 C.F.R. □613. SCAG is also the designated ***Regional Transportation Planning Agency***, and as such is responsible for both preparation of the Regional Transportation Plan (RTP) and Regional Transportation Improvement Program (RTIP) under California Government Code Section 65080.

SCAG is responsible for developing the demographic projections and the integrated land use, housing, employment, and transportation programs, measures, and strategies portions of the ***South Coast Air Quality Management Plan***, pursuant to California Health and Safety Code Section 40460(b)-(c). SCAG is also designated under 42 U.S.C. □7504(a) as a ***Co-Lead Agency*** for air quality planning for the Central Coast and Southeast Desert Air Basin District.

SCAG is responsible under the Federal Clean Air Act for determining ***Conformity*** of Projects, Plans and Programs to the Air Plan, pursuant to 42 U.S.C. □7506.

Pursuant to California Government Code Section 65089.2, SCAG is responsible for ***reviewing all Congestion Management Plans (CMPs) for consistency with regional transportation plans*** required by Section 65080 of the Government Code. SCAG must also evaluate the consistency and compatibility of such programs within the region.

SCAG is the authorized regional agency for ***Inter-Governmental Review*** of Programs proposed for federal financial assistance and direct development activities, pursuant to Presidential Executive Order 12,372 (replacing A-95 Review).

SCAG reviews, pursuant to Public Resources Code Sections 21083 and 21087, ***Environmental Impact Reports*** of projects of regional significance for consistency with regional plans [California Environmental Quality Act Guidelines Sections 15206 and 15125(b)].

Pursuant to 33 U.S.C. □1288(a)(2) (Section 208 of the Federal Water Pollution Control Act), SCAG is the authorized ***Areawide Waste Treatment Management Planning Agency***.

SCAG is responsible for preparation of the ***Regional Housing Needs Assessment***, pursuant to California Government Code Section 65584(a).

SCAG is responsible (with the San Diego Association of Governments and the Santa Barbara County/Cities Area Planning Council) for preparing the ***Southern California Hazardous Waste Management Plan*** pursuant to California Health and Safety Code Section 25135.3.

Cathedral City

July 18, 2000

Nicole Criste
City of Desert Hot Springs
65-950 Pierson Boulevard
Desert Hot Springs, CA 92240

Subject: Draft EIR for the Desert Hot Springs Comprehensive General Plan (SCH No. 2000021006)

Dear Nicole:

The City of Cathedral City has reviewed the draft EIR for the Desert Hot Springs Comprehensive General Plan and has the following comments:

Sphere of Influence

On November 4, 1992, the City Council of the City of Cathedral City, authorized the execution of an agreement regarding the future mutual boundaries of the Cities of Cathedral City and Desert Hot Springs. Both parties subsequently signed the Agreement, attached. Under this signed Agreement, the city limits for Cathedral City would eventually be moved north to 20th Avenue, and would include all of Sections 20, 21 and 22 of Township 3 North, Range 5 East, and that part of Section 30 lying easterly of the centerline of Palm Drive.

The document recognizes that the Agreement may not be binding on future City Councils, however, the Agreement "expresses the intent of the parties, based on extended discussions and negotiations". Further, the Agreement states "the best interests of each City will be best served by continuing to observe this Agreement..." The City Council of the City of Cathedral City continues to respect this Agreement. F-1

Therefore, the City of Cathedral City anticipates the Draft Desert Hot Springs Comprehensive General Plan will be amended to reflect the attached Agreement.

Varner Road

The roadway type designation of Varner Road, east of Mountain View in Desert Hot Springs is a "Major Arterial" with 110-foot right-of-way section. This is not consistent with the City of Cathedral's designation of "Major Highway" at a 100-foot right-of-way. The appropriate staff from each City should meet to address this inconsistency. F-2

68-700 AVENIDA LALO GUERRERO • CATHEDRAL CITY, CA 92234 • 760/770-0340 • FAX: 760/202-1460

The draft EIR identifies the projected build-out to be 49,500 vehicles per day on Varner Road. The models for Cathedral City and the CVAG CVATS do not reach these volumes under any scenario currently adopted. The previously projected maximum volume of any known study was 36,000 vehicles per day.

If Desert Hot Springs, through its General Plan, is projecting that development in Desert Hot Springs will promote significantly increased traffic volumes on Varner Road, then mitigation measures need to address impacts on Varner Road, east of the Desert Hot Springs City Limits. Currently, the condition of the roadway on Varner Road is such that any actual traffic increase in the near-term will cause probable failure of the asphalt, and a capacity level of worse than LOS D. **F-3**

Hydrology

The draft EIR refers to other documents and other agency reports which are either in place or in draft form. Although this a practical approach and reflects the actual responsibilities of the various agencies (RCFCWCD, FEMA, CVWD, US Army Corps), the draft EIR does not provide enough synopsis of the actual plans and impacts of the downstream properties, such as Cathedral City. Additionally, the alternative plan maps show gaps and abrupt endings of natural and man-made drainage corridors. **F-4**

Please address the above matters. For those matters that require further discussion, I would be happy to meet with you or other appropriate parties. Please keep me informed of public hearings or meetings on this matter and if you have any questions please contact me at (760) 770-0370.

Sincerely,

Cynthia S. Kinser
City Planner

Attachment: Agreement Regarding Future Mutual Boundaries

c: Donald E. Bradley, City Manager

AGREEMENT BETWEEN THE CITY OF CATHEDRAL CITY AND THE CITY OF DESERT HOT SPRINGS REGARDING FUTURE MUTUAL BOUNDARIES

This agreement, effective upon the mailing to the City Clerk of Cathedral City by the City of Desert Hot Springs of a fully executed copy hereof, sets forth the agreements and understandings of the parties regarding the future boundaries of the two cities which are parties to this agreement, and their respect for the interests of each other.

The parties do agree as follows:

1. Cathedral City desires to include within its sphere of influence, and eventually to annex as part of its boundaries, all of Sections 20, 21 and 22, and that part of Section 30 lying easterly of the centerline of Palm Drive, as presently established, and that part of Section 29 lying northerly of Interstate Highway 10 and not already included in the city limits of Catehdral City, all in Town 3 North, Range 5 East, San Bernardino Meridian, and that its sphere of interest and planning area of interest will be bounded on the north by 20th Avenue in those sections, with the eventual boundary of the cities then to extend southerly along the Section line between Sections 19 and 20, thence easterly along the section line between Sections 19 and 30 to the centerline of Palm Drive, and thence southerly along the centerline of Palm Drive to Interstate Highway 10.

2. Desert Hot Springs desires to include within its sphere of influence, and eventually to include as part of its city, all of Sections 15, 16, 17, 18 and 19, and that part of Section 30 lying westerly of the centerline of Palm Drive to Interstate Highway 10, as well as all that part of Section 29 lying northerly of Interstate Highway 10 not already included in the city limits of Cathedral City, all in Town 3 North, Range 5 East, San Bernardino Meridian, and agrees that the boundary between the City of Cathedral City and the City of Desert Hot Springs should eventually be along the centerline of 20th Avenue, south of Sections 15, 16, and 17, thence southerly along the section line between Sections 19 and 20, thence easterly along the section line between Sections 19 and 30 to the centerline of Palm Drive, and thence southerly along the centerline of Palm Drive to Interstate Highway 10.

3. Cathedral City respects the interests of Desert Hot Springs in all of Sections 15, 16, 17, 18 and 19, and that part of Section 30 lying westerly of the centerline of Palm Drive, all in Town 3 North, Range 5 East, San Bernardino Meridian, and agrees to not to attempt annexation into such area, and to support any request by Desert Hot Springs to include such area within its sphere of influence, and any request by Desert Hot Springs to annex such area to its city.

4. Desert Hot Springs respects the interests of Cathedral City in all of Sections 20, 21 and 22, and in that part of Section 30 lying easterly of the centerline of Palm Drive and northerly of Interstate Highway 10, as well as that part of Section 29 northerly of Interstate Highway 10 not already included in the city limits of Cathedral City, all in Town 3 North, Range 5 #, San Bernardino Meridian, and agrees not to attempt annexation into such area, and to support any request by Cathedral City to include such area within its sphere of influence, and any request by Cathedral City to annex such area to its city.

5. Each party recognizes that this Agreement may not be binding upon future city councils of the respective cities, but expresses the intent of the parties, based upon extended discussions and negotiations, that the best interests of each city will be best served by continuing to observe this Agreement regarding respect for future boundaries of the respective cities.

6. The mutual boundary between the cities, when fully developed, as agreed to by the parties hereto, is as set forth on Exhibit A, attached hereto and incorporated herein by this reference.

In witness whereof, the parties have executed this agreement by authority of their respective city councils effective as of the date of mailing by the City of Desert Hot Springs of a fully executed copy hereof tot he City Clerk of the City of Cathedral City.

CITY OF CATHEDRAL CITY

By: Robert A. Hillery
ROBERT A. HILLERY, Mayor

Date: Nov. 5, 1992

ATTEST:

Kammy D. Hill
KAMMY D. HILL, City Clerk

CITY OF DESERT HOT SPRINGS

By: Mike Segrist
JOHN ISAACS, Mayor

Date: 2/11/93

ATTEST:

Colleen J. Nicol
COLLEEN J. NICOL, City Clerk

RECEIVED
MAR 25 1993
CITY CL

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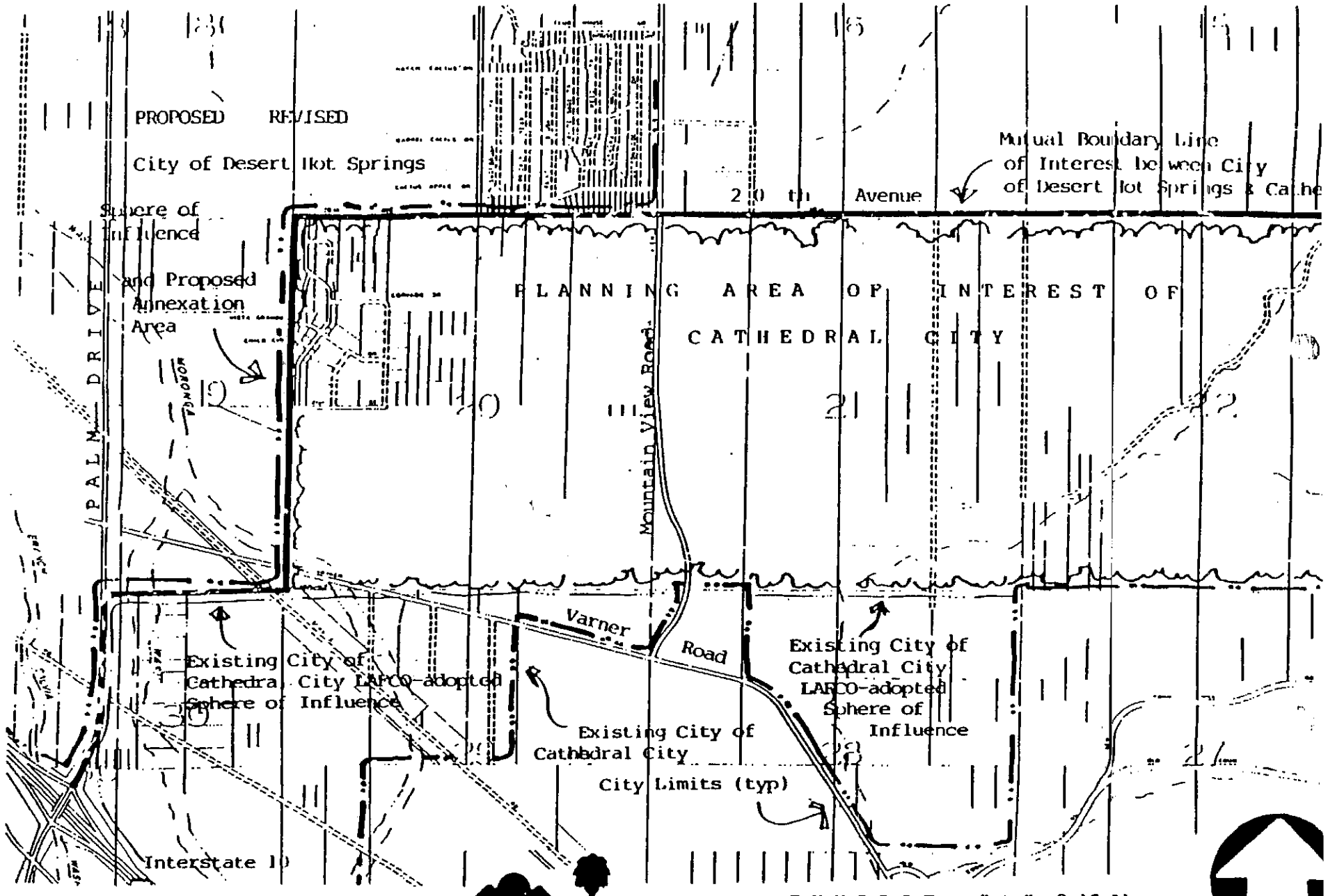

Cathedral City

EXHIBIT "A", 8-15-91
City Council Minute Order
Adopted August 21, 1991
T3N, R5E, San Bernardino Meridian
(Map Not To Scale)

City of Palm Springs

Department of Planning & Building
Planning Division
3200 Tahquitz Canyon Way • Palm Springs, California 92262
TEL: (760) 323-8245 • FAX (760) 322-8360 • TDD (760) 864-9527

July 20, 2000

Mrs. Nicole S. Criste
City of Desert Hot Springs
65-950 Pierson Boulevard
Desert Hot Springs, CA 92240

Dear Mrs. Criste:

G - 1

Thank you for giving us the opportunity to review the Draft Environmental Impact Report for the Desert Hot Springs General Plan. In reviewing the draft report, it appears that the proposed designation of Indian and Palm as an eight lane, divided, 134 foot urban arterial is inconsistent with the Palm Springs designation. It is also inconsistent with CVAG's plans for the I10 interchanges. Under the CVAG plan, the Palm Drive bridge over I10 is proposed as a six lane facility. Under the City's plan, the right-of-way width for Indian and Palm are both 110 feet.

If you have any question about these comments, please contact City Engineer David Barakian at 323-8253.

Sincerely,

Hope V. Sullivan, AICP
Principal Planner

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PALM SPRINGS UNIFIED SCHOOL DISTRICT

980 EAST TAHQUITZ CANYON WAY
PALM SPRINGS, CALIFORNIA 92262-0119
(760) 416-6000
FAX (760) 416-6015

WILLIAM E. DIEDRICH, Ph.D., Superintendent of Schools

BOARD OF EDUCATION: MEREDY SHOENBERGER, *President* — ANDREW GREEN, *Clerk*
MICHAEL McCABE, *Member* — DONALD T. AIKENS, *Member* — SHARI STEWART, *Member*

July 3, 2000

Nicole S. Criste
City of Desert Hot Springs
65-950 Pierson Blvd.
Desert Hot Springs, CA 92240

RE: EIR for Desert Hot Springs General Plan

Dear Ms. Criste:

The following comments are concerning the Environment Impact Report for the City of Desert Hot Springs General Plan.

Page II-17:

Educational Facilities and Services
Public education is provided to the city by the Palm Springs Unified School District, which also serves the communities of Palm Springs, Cathedral City, Rancho Mirage, Thousand Palms and portion of the County of Riverside. The City currently hosts seven public schools, including Bubbling Wells Elementary, Two Bunch Palms Elementary, Edward L. Wenzlaff Elementary, Julius Corsini Elementary, Desert Springs Middle School, Desert Hot Springs High, and Desert Hot Springs Continuation High School. Many of the schools within the Palm Springs Unified School District are currently overcrowded, and efforts are continuing to fund and build additional facilities. At this time, there are no plans to construct new public schools in the General Plan planning area. Three private schools, including Community Children's Center, Palm Springs Christian Schools, and Storyland Preschool are also located in the City. **H - 1**

Page III-138:

In 1986, the State Legislature approved AB 2926, which authorizes school districts to charge development fees for the construction and reconstruction of **H - 2**

public schools. Statutory developer fees are currently $2.05 per square foot of residential development and $0.33 per square foot of commercial development. The City of Desert Hot Springs supports the collection of statutory school impact fees to fund the construction of local public schools. Operating costs for public schools are primarily covered by State Average Daily Attendance (ADA) payments. H - 2

Page III-140:

C. Leroy F. Green State School Building Lease-Purchase Law

(There is a revised new state program.)

D. Lease-Purchase Arrangements

(Funds must be available to accommodate the annual costs.) H - 3

E. Developer Fees – In 1986 the State Legislature approved AB 2926 (Chapter 887), which authorizes school districts to charge development fees to fund construction or reconstruction of schools. School fees currently stand at $2.05 per square foot of residential development and $0.33 per square foot of commercial development. Limits on the maximum fee that can be collected are set by Government Code Section 65995. Also applicable is Government Code Section 53080, constraining the issuance of development permits until proof of compliance with the School District's resolution has been provided.

If you have any questions or I may be of further assistance, please do not hesitate to contact me at (760) 416-6116.

Sincerely

William J. Schmidt
Director, Facilities Planning
& Development

/rl

SOUTHERN CALIFORNIA
EDISON
An EDISON INTERNATIONAL℠ Company

Kathleen DeRosa
Region Manager

July 13,2000

City of Desert Hot Springs
Nicole Criste
Community Development Director
65-950 Pierson Blvd.
Desert Hot Springs, CA 92240

Subject:: Desert Hot Springs Comprehensive General Plan
SCH No. 2000021006

Dear Ms. Criste,

Thank you for including Southern California Edison (Edison) in the review process for the above referenced document.

The General Plan for the City of Desert Hot Springs is located within the service territory of Edison. Edison's power distribution system is prepared to deliver the power by the State's electricity market to this area. The California Independent System Operator is the agency now responsible for managing the State's electric grid and securing power supplies. I - 1

The relocation, reconstruction, extension or under grounding of Edison's electrical distribution system which may be necessitated within the proposed area will be performed by Edison in accordance with Edison's effective Tariff Schedules approved by and filed with the California Public Utilities Commission.

Please include the following comments in your report:

- any under ground districts formed should be limited to 12kV and below.
- It appears you are making no provisions for maintaining the Dever-Palo Verde T/L corridor, as well as other transmission line corridors in and out of Devers. It is important to make sure these corridors are kept for energy delivery and not for open space or some other incompatible use. I - 2
- Edison requests that its properties and right of ways not be down zoned to open space or recreational zoning.

If you have any question or need any additional information, please do not hesitate to contact me at (760) 202-4211.

Sincerely,

Kathleen DeRosa
Region Manager

56100 Cathedral Canyon
Cathedral City, CA 92234
760-202-4211
Fax 760-202-4136

DESERT WATER AGENCY

A PUBLIC AGENCY
1200 GENE AUTRY TRAIL SOUTH, P.O. BOX 1710 • PALM SPRINGS, CALIFORNIA 92263-1710
TELEPHONE (760) 323-4971
http://www.dwa.org

RONALD E. STARRS
President
WILLIAM "BILL" BYRNE
Vice President
F. GILLAR BOYD, JR.
Secretary/Treasurer
F. THOMAS KIELEY, III
PATRICIA G. OYGAR

DAN M. AINSWORTH
General Manager
BEST, BEST & KRIEGER
General Counsel
KRIEGER & STEWART
Consulting Engineers

July 24, 2000

FAX: (760) 251-8351

Nicole S. Criste
City of Desert Hot Springs
65-950 Pierson Blvd.
Desert Hot Springs, CA 92240

RE: DESERT HOT SPRINGS GENERAL PLAN – DRAFT EIR

Dear Ms. Criste:

This letter is in response to your request for comments regarding the above-referenced General Plan, Draft EIR.

The Desert Water Agency would like the EIR modified to reflect a more accurate depiction of this Agency's relationship with the Mission Springs Water District (MSWD) and the management of the Mission Creek Subbasin.

The City of Desert Hot Springs is currently provided service and ample water for normal use and fire protection by the Mission Springs Water District. However, the report overlooks the fact that the majority of MSDW's service area is encompassed by the geographical boundaries of the Desert Water Agency (DWA). These boundaries were established by an act of State legislation in 1961, and provided the authority for this Agency to contract for the importation of water from the State Water Project. As of this date, the Desert Water Agency and the Coachella Valley Water District (CVWD) are the only authorized State Water Project contractors within the Coachella Valley. All references to Mission Springs Water District contracting for State Water Project resources is incorrect and should be eliminated from the EIR. J - 1

Through an agreement with the Metropolitan Water District (MWD), DWA and CVWD have agreed to exchange its State Water Project entitlement for Colorado River water supplied through MWD's Colorado River Aqueduct. Although there are not current agreements, nor are there any on-going negotiations between the Desert Water Agency and MSWD, a portion of this exchange entitlement will ultimately be utilized to facilitate the recharging of the Mission Creek Subbasin. J - 2

As this Agency has assumed the lead role in the management of this Subbasin, contract administration and all costs associated with the construction of any necessary recharge facilities will become the responsibility of this Agency and shall not involve Mission Springs Water District. Desert Water Agency will assess MSWD customers a replenishment fee to help recover the costs of the Replenishment Program

If you should require any further information, please call me.

Sincerely,

DESERT WATER AGENCY

Woody Adams
Senior Service Planner

SGA/jlt

87

The
Gas
Company®

June 14, 2000

Gas Co. Ref. No. 00-343-OG

City of Desert Hot Springs
65-950 Pierson Blvd.
Desert Hot Springs, CA 92240

Southern California
Gas Company

1981 Lugonia Avenue
Redlands, CA
92374-9720

Mailing Address:
Box 3003, SC8031
Redlands, CA
92373-0306

Attention: Nicole S. Criste

Re: Comprehensive General Plan Update – 14,782+/- acres of incorporated lands and an additional 22,180+/- acres of unincorporated planning area.

Thank you for the opportunity to respond to the above-referenced project. Please note that Southern California Gas Company has facilities in the area where the above named project is proposed. Gas service to the project could be provided without any significant impact on the environment. The service would be in accordance with the Company's policies and extension rules on file with the California Public Utilities Commission at the time contractual arrangements are made. **K - 1**

You should be aware that this letter is not to be interpreted as a contractual commitment to serve the proposed project, but only as an informational service. The availability of natural gas service, as set forth in this letter, is based upon present conditions of gas supply and regulatory policies. As a public utility, The Southern California Gas Company is under the jurisdiction of the California Public Utilities Commission. We can also be affected by actions of federal regulatory agencies. Should these agencies take any action, which affects gas supply, or the conditions under which service is available, gas service will be provided in accordance with revised conditions. **K - 2**

Typical demand use for:

a. Residential (System Area Average/Use Per Meter) Yearly

Single Family	799 therms/year dwelling unit
Multi-Family 4 or less units	482 therms/year dwelling unit
Multi-Family 5 or more units	483 therms/year dwelling unit

K - 3

These averages are based on total gas consumption in residential units served by Southern California Gas Company, and it should not be implied that any particular home, apartment or tract of homes will use these amounts of energy.

b. Commercial

Due to the fact that construction varies so widely (a glass building vs. a heavily insulated building) and there is such a wide variation in types of materials and equipment used, a typical demand figure is not available for this type of construction. Calculations would need to be made after the building has been designed. K - 3

We have Demand Side Management programs available to commercial/industrial customers to provide assistance in selecting the most effective applications of energy conservation techniques for a particular project. If you desire further information on any of our energy conservation programs, please contact our Commercial/Industrial Support Center at 1-800-GAS-2000. K- 4

Sincerely,

John DeWitt
Technical Supervisor